

Appendix 1 - Choices for City Plan 2030 Responses

The full responses to Choices for City Plan are available on the Council's website at www.edinburgh.gov.uk/cityplan2030

A Sustainable City which supports everyone's physical and mental well being

Choice 1 - Making Edinburgh a sustainable, active and connected city

1A We want new development to connect to and deliver this network		
Total responses - 905		
Agree 92% (837)	Disagree 8% (68)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • This will make a large contribution to reducing carbon emissions by encouraging a shift from motorised travel to active travel by providing a welcoming setting and more routes. It also increases <i>resilience</i> to climate change, particularly flood risk and heat control. • Provides quality of life and amenity:- boosting mental and physical health. • The network must be a priority to deliver high density brownfield sites. • Reduces noise. Reduce/ calm traffic near these areas. COVID-19 lockdown showed what a car-free city could be like. This should be embraced. • Improves placemaking, however landscape assessment needs to be done. 	<ul style="list-style-type: none"> • Delivery of green network vague and lacking in detail. The network shown in Choices is not a connected network. 200 yards of cycle lane which cyclists need to stop and give way to traffic to at the end, will simply not be used. • The last few routes City of Edinburgh Council have made have been useless - Leith walk is a farce, the connection to the meadows is massively under-used as it is not cyclist friendly. • Map 1 shows some routes that there is little merit to completing given they lie in flood risk areas or are earmarked for airport expansion for example. This map should be checked before informing Cityplan. • Not reasonable to expect development to deliver network in its entirety. 	<ul style="list-style-type: none"> • Not enough information to agree or disagree. • Scottish Environment Protection Agency recommend a strategic flood risk assessment is undertaken to inform the LDP and Green/Blue network. • Green infrastructure will need to be retrofitted in to the existing built environment given limited connections between green and blue spaces. • Map 1 in Choices shows parts of the green network that are actually the Green Belt rather than linking up green spaces in the urban area. • Map 1 showing the existing active travel network is incorrect as some routes shown as complete are not finished.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Biodiversity is enhanced, especially through wildlife corridors but also at a small scale as it can assist with habitat for with pollinators that then have knock on benefits e.g. crop production etc. Some representations note this proposal should require biodiversity net gain for all developments. • Enriches and build communities but it must reduce inequality. • Provides tourism and economic openings. • The network must be accessible, with some saying within 100m of homes and workplaces. • The allocation of greenfield housing sites provides opportunities to extend existing green corridors/active travel routes into the countryside. It is also much easier to plan and build green/blue infrastructure into new development than retrofit into existing built form. Some representations argue however that existing green network assets should not be used to justify housing allocations. • Scottish Environment Protection Agency assert that funding should be proportionate to developer's margin for return from their development and that contributions must be used where most appropriate rather than be tied to the development from which 	<ul style="list-style-type: none"> • Some aspects of network are existing deficiencies it is not appropriate to expect new development to address. • Any requirements for new development to contribute towards the network should be necessary and related to the development and be proportionate to the scale and type of development proposed. • Need to fully understand land ownership as the relevant land will be in different ownerships. • Designation of parts of the network should not be used simply to prevent development. • It will not be appropriate or necessary for all forms of green and blue infrastructure so each site should be assessed on a case by case basis e.g. an urban infill site may not require "blue" infrastructure. • The main issue is the network requires substantial investment and an element of compulsion. If this is not addressed by City of Edinburgh Council the next LDP will just bring about disconnected bits of green space. 	<ul style="list-style-type: none"> • The relevant landowners of new sections of the blue/green network should be consulted before designation. • The parameters and the scope of the Green Network is yet to be defined and consulted upon by the Lothians & Fife Green Network Partnership, part of the Central Scotland Green Network. • The City Plan 2030 must build on the policy framework set out in the approved SESplan Strategic Development Plan (SDP) and adopted LDP. • Clarity sought on who shall maintain this network. Many representors – including some developers and land owners as well as community groups – argue this should be CEC and this needs to be backed by sufficient revenue budgets to prevent deterioration which increases development pressure. • To help achieve this then appropriate sections of urban greenbelt should instead be identified as protected areas of open space and form part of the city's green network.

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<p>they received as this may have no relation to mapped green infrastructure priorities.</p> <ul style="list-style-type: none"> • Scottish Water has successfully piloted a 'geotagging' system that is recommended here to ensure developers to submit a series of detailed photos with coordinates. This can be used to efficiently verify that developer-led aspects of the network are adequately delivered. • There is currently much privately-owned green space in Edinburgh, especially golf courses, some of which could be adopted for public use or at least have routes made around/through them. • City of Edinburgh Council land which is unlikely to be redeveloped within 3 years should be prioritised for temporary greening. • The network requires to flexible and adaptable over the LDP period. • Making optimum choices for the provision should be data-driven; using Graphical Information Systems mapping, census data and visualisation tools. • This should include renewable energy and energy storage. 	<ul style="list-style-type: none"> • The current LDP supports green networks but has not brought about any real improvement. Choices should address why this has not happened. • The network should include play and sport provision • This is not as important as other issues such as maintaining existing green spaces so funds should not be diverted to this network. • Edinburgh already has more green space per head than any city in Europe. 	<ul style="list-style-type: none"> • By gradually removing on-street parking we could also free up space in the heart of the city for this infrastructure. • There should be regard this network to overlap with other networks. Heat networks for example comprise pipes, mainly buried, which typically are laid in streets but which would work well under other land use enabling periodic excavation for repair, to make connections or extend the network. • A citywide Tree Preservation Order should be promoted to assist with this network • Several representations need for walkers to be given highest priority. Concern that cyclists can go too fast, cause difficulties with animals and pedestrians. More needs to be done to restrict poor cycling practices where possible – eg speed limits, separate cycle lanes, speed bumps, chicanes etc. Existing "dual use" paths are not fit for purpose and adversely affect the safety and comfort of pedestrians. • Private school playing fields should be looked at. How much more space per pupil do some of these schools have? One suggestion is to

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Agree 92% (837)	Disagree 8% (68)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • SESplan worked with Scottish Natural Heritage and all member authorities setting out thinking on the city region’s existing and future green / blue networks. This should be a starting point for further refinement of the City of Edinburgh’s network along with the green network proposals in neighbouring plans. • The network should link all forms of green and blue spaces, including coastlines, river corridors. • This network addresses a range of statutory duties as well as deliver on the Central Scotland Green Network, a national development in National Planning Framework 3. 		<p>equalised this so all pupils have the same or for excess to be given to common good or at the very least be accessible to the public on the same terms as state school facilities.</p> <ul style="list-style-type: none"> • Local areas should be asked about specific routes they would like and even volunteer roads to be included in a green route, for example to create only residents’ car access and commit to giving cyclist/pedestrians priority. • There are blue, green network policies already adopted by other Councils around the UK and City of Edinburgh Council should draw on these to formulate a best practice policy to include in the City Plan.

1B: We want to change our policy to require all development to include green and blue infrastructure

Total responses - 893

Agree 90% (805)	Disagree 10% (88)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • This is a necessary component of a brownfield first and a higher density approach to development. • Provides improvement in the quality of environment which would become visually more interesting and more attractive. Landscape and built environment setting and relationship is important to integration. • Biodiversity and ecosystem improvements, particularly increasing connectivity, corridors and habitat. Many of these interventions can form part of buildings. • Boosts public mental and physical health by providing a natural and accessible environment that encourages recreation • Also increases active travel as sites becoming more permeable and there shall being increased active travel connectivity between destinations. Paths and cycle lanes should be separate from roads. • Assists with wellbeing, de-stressing as well as social contact. Sports and play provision should be included. • Creates opportunities to enrich and build communities. 	<ul style="list-style-type: none"> • Certain forms of development which do not necessitate the need for green and blue infrastructure. may be difficult to deliver on smaller of brownfield sites for example and with cognisance to achieving density targets or for listed buildings which are inherently incompatible with many aspects of green and blue infrastructure. • Providing green and blue infrastructure on site may mean reducing the scale, or even abandoning proposals. This is large problem given the housing shortage and the fact there are a number of other City Plan costs and the economy is in a bad place. • Every case should be balanced on its planning merits overall. For example, it may not be feasible to incorporate natural features into every development. A criteria-based policy could assist in assessing circumstances for individual sites. • Green and blue infrastructure should not be seen as an excuse to build more housing and commercial properties just because they have a few of these features as these do not outweigh the impact development would have on the area. • A balance needs to be struck in terms of photovoltaic panels and grassed roofs. Living roofs and septic systems would be inappropriate and potentially cause 	<ul style="list-style-type: none"> • Clear guidelines including examples are needed on what constitutes green or blue infrastructure, the quality and scale of provision required and what alternatives could be agreed where on site provision is constrained. Mechanisms or 'metrics' can support developers and planning officers to interpret what should be delivered at a site level should usefully be included and referenced in this policy. This quality should be measurable and frequently evaluated. • See "Drawdown Review" for the list of growing methods that sequester carbon. • Developers should be funding blue and green infrastructure. The inclusion of green spaces and blue-green infrastructure provision within new developments – as with off-site financial contributions - should be proportionate to the scale of the site and proposal. • There are instances of conflicting requirements between that of the Local Authority and Scottish Water particularly with regard to levels of surface water attenuation. Infrastructure provision must be informed by robust technical solutions and agreed in line with the respective requirements of SEPA and Scottish Water to facilitate adoption. This will be very important

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Reduces noise pollution, in particular from traffic. • Trees and plants absorb particulates and provide cleaner air. • Green and blue infrastructure also controls temperature (for example through tree shading). Helps in other extreme weather events like droughts through providing irrigation. • This is a way to absorb Carbon and methane. • Assists with mitigation and adaptation to a changing global and local climate through reducing the impacts of floods through improved surface water attenuation and using less Impermeable surfaces. • Reduces surface water inflows into the sewer network. This can help free up capacity for new development and reduce backing-up events • Provides economic development openings. This would make the city as a more attractive which would improve the image of Edinburgh on the 	<p>problems for surrounding properties in places such as New Town.</p> <ul style="list-style-type: none"> • New green infrastructure will be important, but it should not be instead of private open space and gardens. New housing should provide for gardens. The coronavirus pandemic lockdown has highlighted the limitations of flatted developments and the advantages of easy access to private gardens. • More research is required on the maintenance and life cycle costs of living roofs. • Green and blue infrastructure takes up space, this is a challenge in delivering the density aspirations if these are to be calculated using gross area. • Green and blue infrastructure will deteriorate as it will not be maintained. • Ponds and secluded areas can also be a risk for young children. • The use of conventional drainage and flood risk measures is adequate, providing these are updated. • It is already a requirement of Scottish Water to reduce rainwater discharge into Edinburgh’s combined sewer network. Scottish Environment Protection Agency also have become increasingly 	<p>given the requirement at question 1H for green spaces to have management arrangements in place.</p> <ul style="list-style-type: none"> • How will the blue and green network tie in with the ‘extra large’ green space standard (1E) proposed design and access statement (2A) revision of design and layout policies (2C) creation of place briefs (4A) etc? • Soil should be included as an aspect of green networks, with the coast and other different forms of water comprising blue infrastructure • Student accommodation has been raised as a form of development that is often especially deficient in blue and green infrastructure. • Green initiatives are not included in the valuation of property, therefore, this unfairly compromises those willing to redevelop. Anyone wanting to sell their property should have to upgrade to green to be fair. • More information needed on how to use and access the green and blue network.

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Agree 90% (805)	Disagree 10% (88)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>National and International stage as a tourist destination</p> <ul style="list-style-type: none"> • This is backed by research and the new Public Health Scotland’s six Public Health Priorities • Many measures can be fitted into urban environment, for example trees in place of parking space and green roofs on buildings that can improve amenity as well as environmental benefits. • This is especially important where there is poor green/blue infrastructure provision at present e.g. where people live further than five minutes' walk away from their nearest usable green space • Disabled users must be considered with blue/green infrastructure. • Living roofs would allow tenement dwellers garden space. • Green and blue infrastructure delivers multiple benefits at one time. Appropriate placement of trees are an example of this where they provide landscape improvements, aid flood control of rivers and sequester CO2. Planting of deciduous stock should be mandatory in all new developments of a certain scale. 	<p>restrictive on development which could create potential flood issues. Better time and use of resource would be spent working with Scottish Water to identify issue points into the existing network and seeking to improve/ remove rainwater discharge from the network by implementation of such blue/ green infrastructure .</p> <ul style="list-style-type: none"> • This is incompatible with the wider goal of increasing housing stock in an affordable manner. The extra costs of this will be passed onto the consumer, meaning higher property prices leading to pricing even more people out of being able to live and work in Edinburgh. • Green roofs and walls do not look good after a few years when they are not maintained. 	<ul style="list-style-type: none"> • Is this something which will require conditioning to confirm implementation? • Opportunities for environmental/biodiversity net gain and blue/green infrastructure should include measures relating to grey assets as well as at the coast, in rivers and more conventional terrestrial parts of cities. Resources to draw on for this include: Greening the Grey report (http://eprints.gla.ac.uk/150672/), Edinburgh’s Shoreline project (http://edinburghshoreline.org.uk), and the SNH biodiversity challenge fund Wildline project in Edinburgh (https://www.snhpresscentre.com/news/nature-fund-announced-gbp-1-8m-given-to-biodiversity-projects). • Ensure that homeowners cannot pave over their gardens, both in new developments and existing housing areas. This can be helped by not forcing permit and parking charges for home owners that park in their own streets.

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Total responses - 893		
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1C. City Plan 2030 shall identify areas that can be used for future water management within a green / blue corridor to enable adaptation to climate change		
Total responses – 862		
Agree 96% (826)	Disagree 4% (36)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Surface water can be more sustainably treated above ground, often in conjunction with other existing surface waters, in a way that contributes to flood risk management that increase resilience to climate change and population growth. • This is important as Edinburgh already has risks of flooding from rivers, the sea and torrential rain. UK Climate projections 2018 improves our understanding of the impacts of climate change with future increases in sea level rise, rivers flows and rainfall intensity being greater than previously understood. 	<ul style="list-style-type: none"> • Further detail required, especially on proposed locations. There is already detailed policy and guidance in respect to water management, taking account of climate change. • Areas will require to be identified through an appropriate water management strategy for the City but there are no supporting documents that identify a proposed water management strategy for the City. Ideally, such a document should be available for public consultation prior to becoming a part of the City Plan 2030. • A draft water management strategy for the City will also require prior consultation with Scottish Water (surface water management) and SEPA (flood risk 	<ul style="list-style-type: none"> • This should include all water as part of the green and blue network, the ‘blue’ element includes our coastlines, lochs, river corridors, routes for rain and surface water and their flood plains. The extent of flooding in the future due to climate change should also be included. • Rising sea levels mean coastal developments have to include flood defences. SNH also note the majority of urban Edinburgh and South Queensferry is protected by sea walls and it is essential that these walls are fit for purpose, including for their role in providing / protecting coastal access. The LDP and other strategies

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Agree 96% (826)	Disagree 4% (36)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> SEPA recommends a strategic flood risk assessment is carried out to inform the LDP and green/blue network. Blue infrastructure delivers many benefits in one. It contributes to controlling heat, reduce air, water and ground pollution, enhance placemaking and biodiversity as well as supports the environment and economic development. It also enhances communities. Water management prevents run off that carries our top soil into rivers which is needed to prevent loss of fertile topsoil. This proposal assists with sewerage network as Scottish Water will not accept surface water in to our combined sewer. Representors have stated flood risk is particularly in the south of the city. It needs considerable management including upgrading sewers. This proposal is more cost effective than retrofitting solutions created by ineffective water management. It avoids more pricy flood protection schemes and the transfer of a flood problem upstream on the Water of Leith and other city watercourses. Development on flood plains should not happen. Sufficient margins along the Water of Leith need to be left to rewild the riverbanks where otherwise 	<p>attenuation) before inclusion in the emerging City Plan 2030.</p> <ul style="list-style-type: none"> Lack of water management opportunities in some areas. There are also constraints such as no open water being allowed around the airport safety (attracting birds). Build new houses with facilities for to allow re-use of "brown/grey" water for certain appropriate functions e.g. for flushing toilets given that cleaning water to is quite carbon intensive so minimise the need for it Focus on conventional solutions: increase capacity at Leith sewage works, dredging rivers and continue updating the water network to houses. 	<p>should be accompanied by a Shoreline Management Plan.</p> <ul style="list-style-type: none"> Keep existing drains clear of all debris as this would also contribute to stopping flooding in some streets. This needs to be accompanied by revised design of buildings to minimise flood damage on areas at risk of flood and timely warnings/advice about impending flooding events. In addition, resources are also required for both inland and coastal flood defences. Others argue there should be no building on flood risk areas at all. The increasing industrialisation of sports facilities and farming and food production practices need careful consideration in open space and green belt areas to ensure that they do not encourage increased rates of run-off and a poorer environment. A consistent approach with SEPA and Scottish Water will be necessary. This will require close working with Midlothian, East and West Lothian Councils. Clear guidelines are needed including examples are included on what constitutes green or blue

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Total responses – 862

Agree 96% (826)	Disagree 4% (36)	
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<p>development might take place. This would promote biodiversity and habitat (e.g. trees and beavers) that in turn assist with reducing flood severity and risk.</p> <ul style="list-style-type: none"> • Edinburgh Council should consider land included on the Vacant and Derelict Land Registry as spaces that can be utilised to manage surface water while creating enjoyable and usable amenity space for the local community during dry weather periods. • Surface water drainage considerations should happen at the earliest stage in the development planning process when land is set aside for new development. The council should designate surface water corridors/routes at a strategic or catchment scale to ensure flows during flood events are routed away from buildings. Land should be allocated strategically to manage and convey surface water on the surface and support multiple developments. • Natural drainage through soft landscaping should not be undermined through the incremental development, for example ‘slabbing over’ front gardens to provide crossovers to create in-curtilage parking. • Schemes must be sustainable in every sense. This encompasses design and delivery, from construction methods and materials to maintenance, utility usage and how water, waste and energy can be reduced, 		<p>infrastructure, the scale of provision required and what alternatives could be agreed where on site provision is constrained.</p> <ul style="list-style-type: none"> • Prior agreement with the landowner is required, and there may be compensation necessary. Co-operation will also be needed) from other bodies such as dock authorities, river trusts and water supply bodies; with direction used if lack of co-operation.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>and integration with public transport, walking and cycling.</p> <ul style="list-style-type: none"> Forth Ports Ltd are supportive however they advise the Planning Authority must have due regard to the water environment within the Port of Leith and Forth Ports' as Statutory Harbour Authority. It is not appropriate for the Planning Authority to put in place policies and proposals which would impact on the water environment within the control of Forth Ports, could impact on their operations at the Port of Leith and their ability to fulfil their obligations as Statutory Harbour Authority. 		

1D. We want City Plan 2030 to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable		
Total responses - 852		
Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Edinburgh is fortunate to have a large number of green areas which are increasingly important if densification continues. Others have argued that very rarely now in Edinburgh is enough natural quality greenspace provided - and this is demonstrated by a lack of accessible natural greenspace being available to all in the Covid-19 pandemic. 	<ul style="list-style-type: none"> Policies set out under this section could lead to a blunt approach being taken to protecting 'poor quality' and underused open spaces'. By introducing a 'permissive' regime, developers will seek to maximise the exploitation of green spaces, obviating the options at a later date for rehabilitating those spaces. It would be less damaging to leave a presumption against development unless on specific 	<ul style="list-style-type: none"> Defining what “underused spaces” and “poor quality” mean is important. 'Development' of open space is vague - does it mean develop space into better space, or does it actually mean build. Does this option refer to privately owned land, or public realm / common good land, or both/either?

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Total responses - 852

Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> This proposed policy is supported on the basis it means there will be investment in open space rather than building on it and that space will be enhanced without a net reduction. These spaces are important for mental and physical health. It is hard to imagine circumstances where development of open space would be acceptable, given the overall ambition to increase and enhance the amount and connectivity of green space in Edinburgh. This would certainly not apply where the space is well used and locally accessible or public realm/common good land. A strong direction that 'brownfield sites' must be developed before 'green spaces'. Consultation is also needed prior to the loss of open space. Spaces must be rigorously assessed with regard to alternative provisions and the balance of existing eco-system services benefits (which should be designated as Local Biodiversity Sites), supported by the place standard. Existing green space often has a mature combination of soils, vegetation (including trees), habitats and microbiome - all of which are difficult to reproduce in newly created green space. Others note that local benefit of spaces must include consideration of access to local services and commercial ventures, such as cafes, shops and entertainment venues, which add social value to the environment under review. 	<p>site circumstances there is a justification for such development.</p> <p>Setting out criteria for development of open space should not be a priority unless and until inefficiently-used *built-up* space (apart from historical buildings) has been redeveloped to increase population density and allow more efficient delivery of services (such as public transport) to the whole city.</p> <ul style="list-style-type: none"> Others have argued the simplistic criteria set out in Choices means developers would argue development is suitable on all open spaces is acceptable if no nuanced framework was available give developers will claim all current spaces were underused and there would be no criteria to assess such an assertion. Some spaces can have worth due to visual amenity benefit from tree coverage for example precisely because they are <i>not</i> able to be publicly accessed. Making accessibility a focus for accepting development risks losing these spaces Unable to support the circumstances where the development of poor quality or underused open space will be considered acceptable until an update to the Open Space Audit 2016 has been completed and a revised Open Space Strategy to replace Open Space 2021 has been consulted upon. 	<ul style="list-style-type: none"> The criteria for "local benefit" must be clearly established. When setting out in LDP2 those areas where there will be benefit in allowing development of open space, it should be clearly communicated as to what those benefits are and how they will be delivered (what, where and by whom). This should take account of the work of Edinburgh's Place Based Opportunities Board and maximise connections which increase social equality. The principles for identification, protection and change of open space set out in paragraphs 224 and 230 of Scottish Planning Policy are key also The Council should prepare Place Briefs for open space sites being developed. A further option, in appropriate circumstances, could be to specify an employment use close to existing communities to reduce polluting commuting. "Improvements" to existing public parks should not include permanent residential or commercial buildings.

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Total responses - 852

Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Priority should be given to protecting existing mature green spaces over replacing them with new ones. Other forms of green infrastructure (e.g green roofs) or play equipment should not be seen as an acceptable substitute for open space at ground level. • Some representations however note some spaces do not meet the accessibility or quality standards set out in Open Space 2021 (often closest to areas where Scottish Index of Multiple Deprivation data shows pockets of deprivation). Furthermore the pressure to develop open spaces in general means there is a need to consider cases where development of relatively underused space / poor quality spaces may be acceptable. • Views differ on what should be done in these situations. Some say space should not be developed even if there is a deficiency in space in the area, though others argue allowing the development of open space should need to improve green connections into wider networks or if improved alternative space is provided in an accessible distance. This should include enhancing biodiversity and water management. Others note development still should only be allowed in if there are substantial alternative open 	<ul style="list-style-type: none"> • It would be unreasonable to release City Council land for development and then require private sector land to be set aside to meet open-space needs. • The policy must allow for flexibility to account for circumstances which may not be evident now in order that they do not prevent development which may come to be considered appropriate in future within the lifespan of the emerging plan. • The loss of open space sites is a permanent loss to the public as once space is utilised it rarely ever returns. So over time the inner city becomes increasingly concentrated - as indeed the new city plan aims to do. 	<ul style="list-style-type: none"> • Open spaces should be clearly delineated and their status defined. • Open space resulting from former arable land or pasture or from owners lack of upkeep should be better scrutinised by the City of Edinburgh Council, and addressed through existing powers. • It is important that an up to date register of 'brownfield sites' is created and maintained. • The changes should also give greater support to tree preservation orders by requiring replacement tree planting where owners seek to fell established protected trees. • Existing sports pitches should be protected • The current policy is not easily comprehensible and can be interpreted to be over-protective of poor quality open-space. • A lot of poor quality and underused areas do not feature in your plan; a lot of it belongs to Network Rail and the Council urgently need to get Holyrood to act on that.

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Total responses - 852

Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>spaces, sports areas and play areas within 10 mins walking distance.</p> <ul style="list-style-type: none"> • This development is also beneficial to deliver needed housing and to meet challenging targets (with some arguing however only affordable housing should be allowed on these spaces). It is stated there would be demand and uptake of many of these spaces from the development industry and this could provide financial capital for green space that would remain in the area. • It is noted however there is a need for strong justification for development and that poor maintenance and neglect should not in themselves be justification for development. It would need to be understood why the space was underused? Could more be done to encourage local people to use it? How? • City of Edinburgh Council should have a policy ensuring no public space is unused for more than 12 months. • Local community bodies/groups should be given proper responsibility with the authority and necessary resources for the development and upkeep of individual spaces. 		<ul style="list-style-type: none"> • Any spaces consented for development in any form should only do so if the land remains accessible to all and is not restricted in access by private ownership to allow pay-to-enter festivals etc. • Any time an area of open space is proposed to be lost there should be additional public consultation, with appropriate experts also involved such as SNH to speak to the other merits of the space such as biodiversity. • Using mobile phone maps technology (just like we have to understand Coronavirus lockdown adherence) can help us understand spaces that have low footfall

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> A landowner of open space or green belt land has a financial incentive to allow it to become degraded and a nuisance to encourage local support for it to be developed if appropriate policies are not in place. 		

1E. We want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces. A 5-hectare green space is the equivalent of The Meadows or Saughton Park. At present our policies require new development areas to provide a park of 2 hectares. We want to increase this requirement		
Total responses - 872		
Agree 83% (726)	Disagree 17% (146)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Edinburgh has seen a progressive reduction over time of green open space so this policy is needed. Contribute to character of areas however it is important to consider built and natural contexts as well as landscape/ countryside surroundings. Spaces should have substantial tree/woodland planting and naturalistic housing layouts. Biodiversity improvements, especially given the large size can accommodate a range of habitats 	<ul style="list-style-type: none"> Doubts whether this standard is compatible with higher density, especially if measured by gross area. It is not proportionate for new development to provide the whole 5ha space, especially for smaller sites. Development may not come forward as a result if this is applied on a blanket basis. Instead account should be had of a site's context. In order to achieve this space standard, land for that purpose would have to be identified over and above the allocation of land for built development to ensure that there is sufficient built development to meet housing requirements and pay for necessary 	<ul style="list-style-type: none"> Maybe some of the city's many golf courses could be turned into parks for everyone. Is it proposed for several smaller areas could add up to a larger overall amount over 5 ha within a certain walking distance or for a single 5ha space? Combined smaller spaces would be more readily accessible than large spaces. It is also queried where a 5 hectare spaces would go in the existing extent of the city so it should only apply to greenfield releases.

1E. We want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces. A 5-hectare green space is the equivalent of The Meadows or Saughton Park. At present our policies require new development areas to provide a park of 2 hectares. We want to increase this requirement

Total responses - 872

Agree 83% (726)	Disagree 17% (146)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Open space is a human right. It boosts mental and physical health. Policies for new green spaces should include facilities for the active enjoyment of open spaces with paths/spaces/facilities suitable for all users, for example, play areas, kick-about areas, sports pitches, etc, to promote more active lifestyles and tackle obesity. With cycling there should be space for cyclists but not to infringe on walkers. This also creates meets placemaking objectives to enrich and build communities. Some have advised that cemeteries, burial sites and growing spaces should also be included. Provides economic development openings. This large scale of public space is needed given the dense, large scale of development being proposed for Edinburgh. Covid-19 has highlighted the need for these types of spaces Assists with reducing emissions and adaptation to a changing global and local climate. It provides part of the space needed for the strategic drainage and water management needed to reduce flood risk, deal with surface water that will no longer be accepted into the 	<p>supporting infrastructure including the space expected. This could result in more land being needed for development which may be, in part, in the green belt, and / or reduce the land available for housing. has the impact on viability and deliverability of new developments been tested?</p> <ul style="list-style-type: none"> The scale of provision should only be applicable to new areas of city extension/ intensification where current provision is not accessible within reasonable walking distance. If greater emphasis is to be given to new higher density housing with gardens to counter the disadvantages of flatted developments in the current coronavirus lockdown, then provision of 5 hectares could perhaps be reduced. 3-5 hectares might be more realistic than a flat 5 hectares. Alternatively it suggested the existing policy framework is retained and 5ha should be a guideline. It is also unclear how the ongoing maintenance of any large new communal spaces created under this policy would be funded. If the cost of maintenance was passed to residents/proprietors of the private sector housing in the development this may create a prohibitive ongoing financial burden that will reduce the attractiveness of new developments to 	<ul style="list-style-type: none"> Open Space 2021 requires to be updated in order to reflect the new Open Space Strategy proposed in the emerging City Plan 2030. Inadequate detail on extra large greenspace standard. What developments would need this? "Access to green spaces" and "within walking distance" need to be defined. How large a population should each 5 hectare space serve? Green Belt designations should have significant permanence with boundaries only reviewed/changed every 10 years e.g. at LDP revisions. There should be explanation of when delivery will be required. These spaces should be safely connected within new and expanding areas of the city. It would be preferable to undertake a quantitative and qualitative assessment of what is required. There should be a broader consideration of the typology of green spaces and parks in a broader sense. This would include the coast and promenades / beaches. Sizes of existing spaces should be re-checked for correctness.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>combined sewer, provide an alternative for surface water currently going into the surface sewer and help build the city’s resilience to climate change.</p> <ul style="list-style-type: none"> • New policy should recognise the importance of creating high quality and diverse green spaces and this quality should not be sacrificed for greater area. For example, new spaces could aligned with delivery of other requirements such as allotments and provision for green and woodland burials. • Some flexibility is required rather than an absolute requirement to account for specifics of each area and land availability and quality requirements are as important as scale. The location of these spaces in the context of green and blue corridors is as important as the size of the spaces. Ensuring good access to the spaces is also equally important. • Planning should also ensure existing dwellings have adequate space and that smaller, local spaces are still required. • Support the policy but it should go further, and also recognise the importance of even larger 	<p>prospective residents -especially given additional proposals such as increasing on-site affordable housing requirements. It is also unfair for developers (and thereby new residents) to bear the whole cost since the new 5 hectare spaces will be used by others outwith new developments .</p> <ul style="list-style-type: none"> • Others argue community trusts should maintain these spaces, with funding from the Council (though others argue volunteers can make a contribution). Some argue for adoption by Council with a commuted sum from the developer towards maintenance. • There ought to be some flexibility in this requirement where smaller high quality space might be preferable to a 5 ha poor quality space. A range of smaller sizes of space are proposed stating 2/3/3.5 hectares is sufficient (with some arguing between 3 and 5). • Reasons for supporting smaller spaces are that 5 hectares is too dangerous to cross at night, that smaller communities do not need such big spaces, that the maintenance of larger spaces will be costly and the fact a network of local parks with currently existing larger but not necessarily huge ones make 	<ul style="list-style-type: none"> • Public open space needs to be truly public not private and restricted in who can use it. • Developers should not be able to get around this with viability assessments or section 75's. • Are we meeting the current standard? If we are not meeting the current standard then setting higher standards does not make sense at this time. • Will the introduction of a 5 hectare standard mean that the reduction in size of existing larger areas be allowed? This should not be the case. • It would be good to have a rationale to explain how the figure of 5 hectare was arrived at.

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Agree 83% (726)	Disagree 17% (146)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>greenspaces over 5 hectares. Why five? Why not four, or six or ten.</p> <ul style="list-style-type: none"> Large spaces are good for community spirit/events and general pride for Edinburgh (though some wish to see fewer large spaces precisely to reduce these gatherings which some consider detrimental to local residents). 	<p>parks available to more people, also those with mobility issues.</p> <ul style="list-style-type: none"> The extra could provide much needed space for housing, recreational facilities, & job creation etc. It will also drive up prices developers will charge for properties due to unavailable space in an already crowded city. Also with Covid 19 we do not want people to congregate in large groups (although others argue that larger spaces will actually be beneficial in light of distancing coming with Covid-19) Edinburgh already has several large areas - Holyrood Park, Hillend, Meadows, Braid Hills, Blackford Hill, Corstorphine Hill. Some argue the need for 5 hectare spaces should be assessed on a case by case basis. 	

1F. City Plan 2030 should identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area

Total responses - 862

Agree 89% (766)	Disagree 11% (96)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Food growing areas should be part of all substantial developments. This will be particularly important given the commitment elsewhere to increase the density of housing development. • To make the world we live in more sustainable, reducing food miles is key. The UK's large reliance upon high food imports that could be adversely affected by climate change, Brexit and Covid-19 • Growing food provides an educational benefit to young and old, offering potential for community involvement and recreation with purpose. They also boost wellbeing and improve mental/ physical health. This should be encouraged particularly as a result of the coronavirus crisis. • Growing spaces improves ecosystems/ biodiversity/organic production as well as air and soil quality. Reduces need for packaging etc. • Growing space is an important part of creating diverse, high quality green spaces which should be considered as an integrated whole. • The small allotments and growing spaces that Edinburgh has so far have been successful. There is a long waiting list for growing spaces and this will 	<ul style="list-style-type: none"> • The Council's aspiration to significantly increase the density of new development is in conflict with providing land for allotments. • Should be assessed on a case by case basis and commensurate to the scale of the development. Opportunities for community growing can be incorporated into new residential developments in a number of ways. A requirement for new allotments and food growing is prescriptive and the policy should allow for a flexible approach to provision. • There is a pre-existing problem that the Council will need to deal with. In order to understand what is legitimately required to support new communities/ developments some evidence should be provided that identifies the demand for allotments from new developments, particularly flatted developments. • By removing local green spaces it would harm local infrastructure by removing well used green spaces from residents, community centres, small business owners and countless others. • It is critical the Council first consider their own ownership (including under used Open Space) before considering other locations. It is also critical that there is prior agreement with the owner (failing which 	<ul style="list-style-type: none"> • There is not enough information given to agree or disagree. Clarity will be required as to whether the Council will provide services, manage and maintain new allotments. • The Inch Park Nursery site is already used for growing, is secured with fencing for any allotment development which would help with the massive waiting list for allotments and also afford the capability of tying in with the Growing/Food/Green activities at Bridgend Farm. Allow the Farmhouse project to use some of the land develop this as they do not have any land to support the healthy eating projects they want to roll out to schools etc. • Allotment requirements should not applied as a 'formula'. A survey of priority needs in each local area needs to be carried out. There are many areas that would rather have, say, space and facilities to occupy older children and teens (fenced 5-a-side court, skatepark etc). • Conversely however other areas such as the waterfront areas of Newhaven, Leith and Granton (North Edinburgh) are noted as having little or no proposed or existing allotment provision where high-density, tenement

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<p>only grow with new housing and the increase in popularity of vegetarianism, veganism, etc.</p> <ul style="list-style-type: none"> • Growing spaces and producing a food growing strategy is a requirement for City of Edinburgh Council as contained in the Community Empowerment (Scotland) Act 2015. • Developers have noted that, where this is required as part of an allocation, allotments should represent part of the Open Space to be delivered on site in line with the Scottish Planning Policy definition of “Open Space”. • The identification of specific sites for allotments is supported however the delivery of such sites should contribute to a sites green space contribution and not be in addition to it. Growing spaces need to be assessed/agreed as part of the wider development contributions being sought. • Allotments need to be located near the people who want to use them, so even very small parcels of land, or small corners of other green spaces should be utilised. • This proposal is needed as modern developments are particularly disadvantaged in this respect due to factoring maintaining such spaces. 	<p>the allocation will fail the tests of effectiveness set out in Scottish Planning Policy).</p> <ul style="list-style-type: none"> • Identify specific sites within existing open spaces, especially underused open spaces for new allotments and food growing. • For medium density housing with back gardens means then less allotments will be required. • Allotments are good, but they're exclusive. Community garden schemes for food growing would be better. • Manage the existing ones properly. Plotolders neglecting plots should be removed. It's disgraceful that this does not happen. • Less important that other objectives such as parks and active travel that benefit a wider portion of the population and reduce CO2. • Allotments and growing spaces look untidy and are not maintained well. • Urban growing is highly inefficient in producing food compared to rural farming. Food grown on allotments 	<p>housing means fewer households have access to their own private garden.</p> <ul style="list-style-type: none"> • The way growing spaces are used is important to. There are existing techniques already developed and where they can be adapted as these can prevent water pollution, biodiversity loss and soil erosion, while providing ample amounts of food. • Too much development is allowed on prime farmland, which needs additional /stronger policies for its protection. • There should also be tighter regulations on the maintenance and management of the allotments to ensure that they contribute aesthetically to the local area. • 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. • 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 gardens.

1F. City Plan 2030 should identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area

Total responses - 862

Agree 89% (766)	Disagree 11% (96)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • A shared community garden / growing space may suit local communities better, and be more productive and equitable than allotments for individuals or even small private gardens. • Old walled gardens in and around Edinburgh that could be returned to their former use and become market gardens. This would then provide new skills and careers. • New allotments can also reduce inequalities in access to places where people can grow things - especially important for disadvantaged and deprived communities. • Scottish Environment Protection Agency considers that these sites could form part of a connected, considered, multi-functional green/blue infrastructure. By giving parts of the green network a function, and individuals /community groups an interest in maintaining them, maintenance of part of the green network and community involvement in it is built in. Use buildings and roof-tops for allotments/growing spaces. • There will be an important role for the proposed place briefs to identify these specific sites for new allotments and food growing. 	<p>is often wasted as it tends to come in gluts. Urban crops are also much more susceptible to contamination. Urban growing undermines the rural economy.</p> <ul style="list-style-type: none"> • People who want to grow veg can buy properties with gardens or tend to rural plots. Larger gardens should be required in houses to allow this. • Allotments and growing spaces usually only relate to Council owned sites so City of Edinburgh Council should be driving them forward at council level without the need for LDP designations. 	<ul style="list-style-type: none"> • Could golf courses be converted for this purpose. • New growing spaces must be close/accessible to residents and should have access to sunlight. Also more council run sites would be more equitable and reduce the rise of 'private' consortiums restricting allotment use. • Growing spaces/allotments are especially good for being able to be accommodated in small pockets of space for example at the scale of 2-4 allotments. Others argue however that concentrating numbers is safer for all and can share lighting infrastructure/tools etc. • Parking provision needs to be made as part of allotments/growing spaces given equipment needed to maintain them. • Allotments should be divided into smaller sizes to serve more people as they are presently too large for one family.

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Total responses - 862

Agree 89% (766)	Disagree 11% (96)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • There are a number of examples of integrating community growing into the wider urban area, including using streets, roof spaces. Others argue growing spaces could be included as part of any new greenfield releases. • The expansion of community food growing could help to deliver the Million Tree City through increased provision of orchards and single fruit growing trees in appropriate spaces. • In unlikely event of overprovision of growing spaces/allotments in future then space could be turned over to community or even private initiatives. • No maintenance cost of these spaces for the Council. 		<ul style="list-style-type: none"> • We should also ensure that every school grows food and that growing is part of the curriculum. • Allotment holders should also, in time, be allowed to keep hens and bees. • Suburbs are better for this than central locations • Provide further guidance, funding and support for how to set up and grow in allotments as well as extra security etc. there should be a "garden exchange" scheme where people who cannot manage or afford to look after their garden give part of it over for someone to use freely in exchange for their keeping the rest tidy.

1G. We want City Plan 2030 to identify space for additional cemetery provision, including the potential for green and woodland burials.

Total responses – 816

Agree 76% (617)	Disagree 24 % (199)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Some representations give much stronger support to green and woodlands burial schemes compared to burial in a city cemetery as the former can also contribute to creation of diverse green spaces. • It is noted there has been an increase in non-traditional burials also. • Green and woodland burials will also help relieve any pressure on historic burial grounds. • Some also argue that there may be scope in some existing cemeteries currently closed to new burials for green and woodland burial sites, provided this does not impact on their value for encouraging wildlife and biodiversity. • A number of representations argue the cemeteries should be discouraged as there is limited space and cemeteries effectively sterilises land for hundreds of years. • Instead some argue cremations would save space and that memorial gardens should be provided with spaces for cremated remains. Making this a better known option and more easily available would encourage a lot more 	<ul style="list-style-type: none"> • Cemeteries involve roads , buildings, car parks, fences etc that can urbanise green spaces and become visually intrusive. • Caution against identifying such space in a plan, as landowners may not bring it forward for such use. This is critical to avoid allocations in the plan which fail the effectiveness test in SPP. • Instead recommend a criteria based policy to allow providers to identify the sites most fit for purpose • Others recommend preference should first be afforded to land already vested with the Local Authority (including underused Open Space). • Green and/or woodland burial sites are not appropriate in urban or semi-rural, semi-urban locations. These would carry serious risks of vandalism. • There are contrary views on proposals for woodland burials, and there will be an ongoing challenge of sustaining the protection and maintenance of woodland burial sites. 	<ul style="list-style-type: none"> • Unable to have a view about 'green and woodland' burials until the site location specification, design and infrastructure/ drainage requirements associated with these burials is fully specified. • The clarification of these specifications has now become urgent, as a result of increased demand for burials due to Covid 19. • Cemeteries need to be developed with great care to ensure contamination of ground water is not an unintended consequence. SEPA will work with City of Edinburgh Council to help identify suitable sites. • Green and woodland burials should be affordable to more people or even free, though it is argued these burials are for the wealthy within the city given space is limited. • Other methods for disposal of the dead are suggested, including; Human compost funerals are 'better for environment' (although others argue that "human composting" are macabre), Freeze blasting and a memorial tree planting scheme in parks to conserve space but also give place for loved ones to remember the

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Total responses – 816

Agree 76% (617)	Disagree 24 % (199)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>people to choose, although some state many people already do not wish to be buried.</p> <ul style="list-style-type: none"> • Others argue however that cremations are not environmentally friendly given CO2 is generated • Some support for green and woodland burials is contingent on where these are located. Some support them based on the presumption that these are located outwith the urban envelope or sensitively located within the urban area, although others state actual forest is not acceptable. • It is argued a range of carefully considered settings should be considered (including in the countryside) as this would maximise choice and reduce urban land used. • There are strong requirements for burial provision for some religions. There is however the practical problem that- space within towns has to be prioritised for the living. 		<p>dead. Can also have more than one person buried on one site and/or bury the dead standing up. Graves should be biodegradable and have a lifespan of a time of mourning. Presently cemeteries are also a drain on finances for upkeep</p> <ul style="list-style-type: none"> • New cemeteries should aim to more 'wild' as unkempt havens of nature where people can go and picnic and play amongst the stones. • Some argue however the public will feel uncomfortable with walking past burial sites and they would be at risk of vandalism in an openly accessible area. Also, to respect the families of the deceased then areas would need to be segregated to allow mourning away from joggers and kids playing and running about etc - • This is a pre-existing problem and should be the responsibility of City of Edinburgh Council. It should not be required as a developer contribution. • These should be located outside the city centre with good bus routes for access.

1G. We want City Plan 2030 to identify space for additional cemetery provision, including the potential for green and woodland burials.

Total responses – 816

Agree 76% (617)	Disagree 24 % (199)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		<ul style="list-style-type: none"> • Convert current cemeteries and rebury current graves. This would allow rewilding of cemeteries or repurposing. Others strongly oppose digging it up and burying bodies

1H. We want to revise our existing policies and greenspace designations to ensure that as part of planning consents new green spaces have long term maintenance and management arrangements in place. The Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available

Total responses - 839

Agree 87% (732)	Disagree 13% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • All green/blue space within a city, whether wild and natural in appearance or very manicured, need management to ensure their qualities are maintained. This includes any water management infrastructure as well as biodiversity and to assist with climate change. • Good maintenance of green and blue spaces creates an aesthetic environment; positive effects on everyone’s mental health; promotes appreciation of green spaces; encourages outdoor activities; builds communities; helps keep air clean. • There is strong support for more ‘natural’, informal green and blue spaces given the lesser cost of these and the fact it would deliver greater these benefits to a greater degree. • This is important to ensure green space does not become a space for fly tipping or undesirable/illegal activity. Space should be safe for people to walk through in the dark. • Some representations argue that applications for development must be required to be supported by 	<ul style="list-style-type: none"> • This is another cost to a new householder. A viability and deliverability assessment should be carried out in respect of all the proposed policies of the plan and set out against the ambition that Edinburgh will be a “A city which everyone lives in a home they can afford”. • Factoring should not be covering the cost of new, larger spaces that are for the benefit of those beyond the immediate development being constructed. This is unfair on the new, private homeowners paying for it,. These should be adopted and maintained and managed in a similar manner and paid for through Council Tax. <p>Others note however that it is those closest to spaces which most use and benefit from them so it is right they should pay for factoring.</p> <ul style="list-style-type: none"> • Some representors argue that responsibility for spaces, including some budgetary responsibility, should be given to local, public groups. • Developers should be contracted in as part of their planning permissions to provide funding for the council to be able to maintain and develop the few green spaces that are left. 	<ul style="list-style-type: none"> • Some representors argue that responsibility for spaces, including some budgetary responsibility, should be given to local, public groups/become common good land. The management arrangement should be agreed with locals and that the cost would be transparent to anyone and able to be challenged if not competitive. • The adoption of green spaces needs to be promoted more strongly to businesses, philanthropists etc. Tax incentives plus publicity could raise their profile. • Maintenance should be dealt with on a case by case basis given varying circumstances. • Private developments must have robust management plans in place that go decades or even a century into the future. • The current standards of planting poor, with the cheapest species and variety used, or negligible amenity or wildlife value, and with

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Agree 87% (732)	Disagree 13% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>demonstration that such long-term management and maintenance is achievable.</p> <p>Most, though not all, developers favour factoring arrangements as these provide proper management and maintenance in perpetuity. Some argue that if the owners of the houses are to pay for their green spaces, then the cost has to be protected by law to avoid subsequent, excessive payments.</p> <ul style="list-style-type: none"> • Factoring means the residents of homes, whom directly benefit from such provision, carry an equitable financial burden and interest in maintenance. • These representors note good Factors following appropriate guidance and regulation need to be properly supported to ensure that their services are covered. • Many non-developer representations consider there is a poor standard of long-term maintenance provided by many factoring arrangements that leads to a lack of use as well as deteriorate over time and become an eyesore and problem. These representations point to many current examples of poor factoring across Edinburgh. Public ownership also avoids potential restriction of access. 	<ul style="list-style-type: none"> • Maintenance should be dealt with on a case by case basis given varying circumstances. • Some say adoption should only be allowed if voluntary and by consent of the land owner, with provisions to take back from the council in future. • Some argue the Council's standard of maintenance is poor so they oppose adoption. There is a lack of 'checks' on contracted out projects leaving assorted debris throughout the city. Contractors cannot be trusted to manage and sign off their maintenance projects. 	<p>insufficient consideration given to resilience against disease or climate change</p> <ul style="list-style-type: none"> • The council should push back into private sector more strenuous conditions for use for private events to avoid deterioration of the spaces hosting these events. • why does this only apply to new spaces? Surely this should also include all existing green spaces, except perhaps those large gardens within the city centre that are privately owned? Or should those garden be compulsory purchased and opened up to for the benefit of all residents and visitors. • Monitoring should also be considered, both before and after development. This is particularly important when it comes to aspects of managing the water environment (including management of Sustainable Drainage Systems). There should be a mechanism to end, poor factoring agreements.

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Agree 87% (732)	Disagree 13% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Representors are cynical that this will always be the case given factoring inherently focusing on profit and not residents, with many noting factors are hard to contact to address issues (especially since planning requirements are often poorly translated into deeds or absent). It is not uncommon for factors to ignore site usage rules to the detriment of the site or people living nearby and or using the site. Consequently many representations, and a smaller proportion of developers, argue the Council should adopt all new green and blue spaces. Some argue the costs of adoption should be tax funded however, many representors highlight the resource implications for the Council in adopting spaces (though it is noted jobs would be provide). Consequently it is recommended that developers should provide the Council with a commuted sum to take adopt and maintain spaces (some further arguing contributions should be taken toward existing spaces as well as new ones). It has been noted if this proposal involves contributions from new residents and businesses who may occupy areas involved with long-term maintenance arrangements then this must be very transparent. 		

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Total responses - 839

Agree 87% (732)	Disagree 13% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> It is critical to make an assessment of long-term implications for maintenance and management, before applying any planning conditions/Section 75 for green spaces in new developments. 		

Choice 2 – Improving the quality, density and accessibility of development

<p>2A. We want all development 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.</p> <p>Total responses – 806</p>		
<p>Agree 90% (724)</p>	<p>Disagree 10% (82)</p>	
<p>Reasons for agreeing</p>	<p>Reasons for disagreeing</p>	<p>Comments / other issues raised</p>
<ul style="list-style-type: none"> • This promotes the place principle in developing planned and design led solutions that address the issues of climate change, adaptability and access to create and futureproof communities that can adapt for all stages of life – which is especially important as our society grows older. • This proposal must be done at both at the neighbourhood and individual site level. • Large developments should create communities, not merely the provide housing units. They should include green space, public transport nodes (including shared travel schemes), provision of services, and integration into the surrounding environment. • There must be no dilution or ambiguity in the standards. This will ensure there is a consistent approach on determining applications. Some however state any deviate from this needs justification and detailed explanation as to why it cannot be used. 	<ul style="list-style-type: none"> • The requirement for all development to have a Design & Access Statement, is contrary to national policy requirements on the submission of such documents. Cityplan must be consistent with this. • Design and Access statements already contain the information sought in this option. • The requirement for Design and Access Statement should continue to reflect the Edinburgh Design Guidance (November 2018) which covers what is required in these statements, as well as the existing applicable LDP policies which are acceptable as they are in providing a framework in accord with the statutory requirements of the approved SESplan and SPP. • Building standards and other consenting regimes and often the most appropriate ways for consideration of many of these issues, including design details. It will be important that any policy avoids duplication and adding unnecessarily to the significant amount of documents already required to accompany applications, adding time and cost to both their preparation and processing. It may also deter 	<ul style="list-style-type: none"> • There is not enough information given to agree or disagree. What is meant by adaptable in this context.? 1) whole development adaptable to climate change and/or 2) individual buildings adaptable to climate change, e.g. retro-fitting heat pumps?, and/or 3) development, or building, level adaptability for accessibility issue? • As a possible alternative that applicants should have to demonstrate how the design will reduce/minimize emissions, rather than tackle climate change. Emissions include both greenhouse gases and air pollutants. It is possibly something that can be more easily measured and demonstrated. • Local Authorities (LAs) must monitor and, if necessary, enforce this as well as the 'climate change plan'. Penalties should be up to, and include, demolishing if requirements are ignored in the final construction.

2A. We want all development 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.

Total responses – 806

Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Measurable criteria should be established from the outset to enable fair and consistent application of any new standards. This need to counteract and adapt to climate change should be demonstrated in all applications, for example by reducing flood risk and not merely avoiding it. It is vital that developments maximise opportunities to use low/zero carbon heat. The City Plan must also support the delivery of Local Heat and Energy Efficiency Strategies (LHEES). The potential future energy needs of development must also be addressed as far as possible, such as the increasing demand for electricity or alternative energy sources such as hydrogen for appliances and vehicles Poverty has increased across the City with this experienced, in many cases, by families with a member with mobility challenge. Improving accessibility has the potential to contribute towards improving this wider social issue. Flexibility in design to allow future reductions in car parking provision is wise given we are planning until 2030. Add a generous supply of high quality, secure 	<p>development from taking place, especially for smaller developments/conversions.</p> <ul style="list-style-type: none"> Planning policy which conflicts or goes beyond other statutory requirements causes confusion and delay and adds unnecessarily to costs. It is important that the requirement “to demonstrate” is reasonable and proportionate. This is important given the present economic outlook is very uncertain. There may be some buildings where accessibility issues, or climate change mitigation, may simply be unfeasible and/or unduly onerous. For example, the adaption of older buildings including tenements may not easily be amended for accessibility design issues. This could prevent those otherwise sustainable brownfield sites coming forward for development. There are concerns this proposal means disposing of the current DES 1,3,6,7,8, HOU 4, Env 20. Clarity required on how ‘future adaptability’ should be illustrated as part of a planning application for a development. The proposed measures should only apply to applications submitted following adoption of the LDP and not retrospectively to currently pending applications. 	<ul style="list-style-type: none"> We need a better understanding of what people with varying needs require and how we can also bring people with differing needs together in some of the space. Modify this proposal to include a target of 10% accessible housing in line with the recommendations of the Equality and Human Rights Commission to ensure that a minimum of 10% of new housing is built to wheelchair-accessible standards. Others argue the equalities legislation is sufficient to address this. All new-build ground floor should also be readily adaptable for installation of tracking hoists and wet floor bathrooms. Any standards set out should now account for any Covid 19 effects, for example paths may need to be widened to facilitate 'social distancing' and greater facilitation of working from home in dwellings. The quality of the new-build environment permitted all Councils other councils has, all too often, been emphatically not "fit for purpose". The impact of all this sub-optimal

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Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>storage for shared bikes and normal bikes in close proximity to or within housing.</p> <ul style="list-style-type: none"> It is important that all new building, particularly in the city centre, are designed to be adaptable to possible change of use – especially to residential. It could be requirement for Design and Access Statement documents to include a standard set of information and this needs to be submitted before an application is validated as well as the minimum standard required. Developers should have to support development of public transport for their proposals and car parking spaces should have to be financially offset through green initiatives. Design statements should still retain a focus on quality of design that should maintain Edinburgh's sense of place, for example using natural sandstone and other local materials where possible. 	<ul style="list-style-type: none"> This policy should go further in requiring greater environmentally positive measures. Many suggestions were made, this included: completely car free developments, as well as solar panels/ground source heat pumps. There should be green walls and roofs on all developments. All materials used should be sustainable materials. There should be mandatory protection for all existing mature trees. All houses should be passivhaus standard. Stop developers using individual gas driven central heating as a first step to moving to district heating. Design and access statements should also demonstrate how the development will add value to the community in terms of accessibility of local services, shops and facilities within walking distance. This emphasis on going further applies to each of the other applicable options set out in Choices also. These requirements is open to tokenistic responses from developers. The future uncertainty created by climate change and Covid-19 means we should not be introducing requirements for such an unknown future. 	<p>construction has been to substantially degrade and diminish not just the immediate area of the development site itself but the wider environment too – clogging up the central belt and strangling its towns and cities.</p> <ul style="list-style-type: none"> Development should have to leave land to put the sub stations in to provide charging points so as to avoid, or there is a creep into public land. Better routes for walking and cycling are a necessity and should be along all current bus routes in place of existing road space. A far more thorough and demanding set of compulsory sustainability criteria need to be required of applicants (including appropriate baseline surveys to determine the presence or absence of priority wildlife and habitats) as well as accounting for the water environment and soil exhaustion. Do not use prefabricated units to build houses with. They will not last.

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Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	<ul style="list-style-type: none"> • Do not allow solar panels, they are very inefficient at this latitude and climate. Also solar panels require rare earth metals with in the harvesting of these elements produces several metric tons of co2 also in the manufacturing of solar panels produce high amount of toxic waste which stays toxic for a long time. They are also visually unsightly. • For some of older buildings it is argued that the suggested adaptations are just not possible. This policy puts them in danger of being knocked down and new development put in place. This is not environmentally friendly. • Removing space for parking encourages taxis to constantly arrive and leave, dropping people off. Taxis then wait for pickups running their engines constantly. 	<ul style="list-style-type: none"> • Prevent the use of garages that are not large enough for cars as this is wasted space that could be put to better use. • Noise transference issues must be dealt with - not just airborne sound but also impact sound which is very hard to retrofit away. • consider other green energy generation on all housing, retail and business concerns as well as blue or green infrastructure for car parks and infrastructure. Others argue it would be too financially onerous to apply requirements to <i>all</i> buildings. • Demonstrating how proposals account for children as well as older residents is required. • If houses are to be adaptable, there must be minimum size standards imposed – currently our houses are the smallest in

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		<p>Europe with almost no storage, creating stress and mental health issues.</p> <ul style="list-style-type: none"> Climate-impact should include construction process and the environmental impact of the materials used. Retention and reuse should be an absolute priority. Some argue new housing should only be allowed where it replaces older, energy inefficient homes.

2B. 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.

Total responses - 805

Agree 64% (724)	Disagree 36% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Higher densities are needed to accommodate the additional housing Edinburgh needs for its increasing population. Supported on the basis higher density developments are located by active travel networks and public transport and developed and contribute to green and blue network. This will reduce have positive impacts for the climate and air quality. The efficient use of land is encouraged by SPP. Dense developments must be sensitive located and designed to be high quality and sensitive to the existing built and natural environments. This are especially relevant in Edinburgh, for example it has variegated and historic townscape that is sometimes low-rise in nature. Spaces between buildings and the setting of many landmarks need to be preserved also. Many parts of Edinburgh are already a dense and 'vertical' city dominated by traditional tenement dwellings with a vertical aggregation of uses. This creates mixed use, sustainable communities with appropriate greenspace, amenities and services as part of the solution. This should include workplace possibilities, healthcare facilities, schools, nurseries, youth clubs, shops and parks. 	<ul style="list-style-type: none"> Applying minimum densities mechanistically is not an appropriate strategy. It is contrary to aims of SPP to provide positive and flexible approach to development as well as encourage placemaking as also set out in Designing Places. It takes no account of site specific circumstances for example in terms of character and density. As a result it may not be possible for some sites to be developed if they have to meet a minimum density requirement as well as comply with design and amenity planning requirements for example. Also, this arbitrary density requirements takes no account of how units would be occupied. For example, one would not expect the same density for a block of flats inhabited by single people and couples with no children as one would if its aimed at households with children, and possibly three generations under the same roof. Overall however brownfield sites for example require little supporting infrastructure however in contrast to greenfield sites require new infrastructure so applying the same density requirements is not appropriate. This also illustrates the use of gross density to calculate dwelling density per hectare would be unnecessary and detrimental departure from current design policy as it would include road infrastructure etc. Applying a typical gross to net ratio (assuming 70% of the site is "developable" – applicable to 	<ul style="list-style-type: none"> City of Edinburgh Council's view is that 80% of units would be houses at a density of 65 dwellings per hectare however according to the EMA analysis this split would be the opposite way round if based on a gross site area. Even on a net developable area then only 50/50 can be achieved. Others have noted that, even to achieve 50/50 mix across a site would need 4 storey flats and 2 storey housing, but only if 2/3 of the housing is terraced. This will derive a layout providing predominantly smaller 1, 2 and 3 bed homes with little prospect for providing family housing. To achieve a density of 93 homes per hectare (net) or 65 per hectare (gross) would require a different design solution which would require a greater percentage of flats (around 75%) or much higher flatted buildings (around 6 storeys). It would be unreasonable to on the one hand set out a policy on density which would require a high proportion of flats while on the other seek higher education

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<p>Mixed uses mean people have to travel shorter distances for day to day activities such work and amenities - it is typically more sustainable with a lesser environmental impact, doing more with less. This accords with the placemaking principle. Particular support for the Paris based idea of having all needs satisfied within 15mins.</p> <ul style="list-style-type: none"> • Denser more compact development allows more space for more generous green spaces closer to dwellings (some developers argue the opposite however) and which can have many benefits including surface water management (something which especially benefits from being close to the development it serves). Green and blue spaces also improve health, biodiversity, placemaking and community building amongst other factors. Allotments and growing spaces can be provided too. • Higher densities allow more efficiencies across a range aof areas, including in terms of energy generation, storage and conservation. It also allows optimal use of space in layouts, for example to provide extra amenity and functionality such as cycle parking etc. • Whilst we agree that increasing density thresholds is appropriate, it is suggested that policy should be more dynamic. Rather than one or two absolute minimum thresholds, could density requirements 	<p>Greenfield and larger Brownfield sites) then that minimum density would rise to 93 homes per hectare (net). Instead we should continue using net developable area.</p> <ul style="list-style-type: none"> • The reality of socio-economic aspects is some people can afford four-bedroom detached or semi-detached houses with big gardens, but many cannot and/or do not want them. • Some have argued that there are both historic and suburban townscapes which are lower density will be harmed by high density proposals. There should be unambiguous rules about height and density of new building matching neighbouring buildings. Potential impact on historic skyline views and potential loss or world heritage status. A decline in tourism could result. • The average level of density of new dwellings being built is less than set out in Choices. A more detailed review of the Housing Study figures also raises questions over the number provided and their general applicability. The actual average figure is 63dph. When 2019 completions are included (i.e. 2008-19) this decreases to 59dph. When disaggregated, the average for brownfield sites is 70dph and 30dph for greenfield sites based on the gross area. The supporting evidence used to establish density is inconsistent. It is unclear 	<p>contributions based on a higher proportion of houses. An 80/20 ratio of houses to flats may therefore be more appropriate on greenfield sites, or at least a more flexible approach based on consideration of each site’s specific circumstances and accounting for infrastructure.</p> <ul style="list-style-type: none"> • If this approach is not adopted, then the land in question will simply not be developed or not be developed in phase with the need to deliver infrastructure. In that way, existing communities will continue to suffer from lack of investment and be prevented from benefiting from such investment all while higher numbers of new residents come into an area. • A capacity assessment based on “persons or beds per hectare” not “units per hectare” should be considered as it is the number of bedrooms which sets the real people growth impact on an area, not units. This approach gives flexibility to provide a wider range of housing stock with developers not being solely restricted to small dwellings to meet density targets but instead able to provide larger dwellings that can have more bedrooms.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>vary and be identified for different areas and linked to current and planned PTAL ratings for example?</p> <ul style="list-style-type: none"> A further suggestion is the 65 dwellings per hectare proposed standard could be applied to urban brownfield sites (although some argue the 100 dwellings per hectare is appropriate for brownfield and others go further advising even 100 dwellings per hectare is too low simply mirroring the ten-year average in the city). By comparison a lesser density range from 50-65 units per hectare for greenfield land releases in sustainable locations which are close to public transport and active travel routes. As detailed in the Urban Design Compendium, research suggests net densities of 100 persons per hectare are required to sustain a good bus service, which equates to around 45 dwellings per hectare based on UK average household size of 2.2 persons, albeit there is some flexibility. Other suggestions states densities should start at 30 dwellings per hectare or 40 dwellings per hectare is the least dense areas in line with current edge of settlement densities. Varied densities also result in more varied types and tenures as well as better placemaking with varied characters in the places being created, with lower densities at settlement edges softening the visual and 	<p>why the average density of what has been built to date should be applied as a strict minimum henceforth, especially since the mean average leading to the 65 dwellings per hectare had a huge variation in densities as expected for different site areas and locations. Queries over the current density in the city and by city block? How does that compare to other cities?</p> <ul style="list-style-type: none"> Households will not able to find home which meets needs with more homogenous flatted housing stock in terms of types and tenures. Consequently the variety and hence proportion of buyers that can be catered for will be reduced, particularly for larger homes with gardens. This will limit ability to adapt to change. It also means there will be less demand and few homes built. In addition it will increase the cost of family homes and result in migration of families to neighbouring authority areas in line with market demand. This is less sustainable and goes against one of the fundamental principles of the Choices for City Plan 2030 which is to ensure Edinburgh is a 'a city in which everyone lives in a home which they can afford'. This is reflected in the Council's current guidance which requires that a minimum of 20% housing is provided for family use. A wider variety of new homes will also help to drive more moves in the second-hand market increasing choice and competition following a sustained period of low transactions volumes. 	<ul style="list-style-type: none"> Notwithstanding this, it will be essential that the other supporting evidence on education requirements is transparent, robust and consistent with policy and case law. We would expect these shortcomings in the evidence to be fully addressed to allow meaningful consultation. Minimum densities should be in consultation with those promoting sites. It should be clear if density is to take precedence over other policies such as those requiring greenspace. Some argue that it should be made clear density has priority in such cases. Density must consider garden areas per dwelling with a flexible standard of rear garden to allow for building extension or adaptation. This may be assisted by early clarification of what the City of Edinburgh Council intends to apply as permitted development rights. Shared transport provision with share bikes and car clubs work best in high density developments and could be a key to providing a means to travelling outward from high-density areas.

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<p>landscape impact of new settlement edges for example.</p> <ul style="list-style-type: none"> The setting variable densities also allows account to be taken of urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space. Place Briefs and masterplans should identify and design appropriately for densities (although some argue they remove the need for densities completely), with it added this should be done before finalising LDP allocations. With this being particularly requested for larger sites for example over 4ha and undertaken by the landowner(s) and Council supported by all necessary disciplines and statutory undertakers. Murray Estates and 7N Architects argue it is possible to achieve an average density of 65 dwellings per hectare across the whole masterplan for Hermiston Park, with a variety of housing typologies/tenures, densities and neighbourhood characters. This will be essential to establishing a diverse and successful community for inclusive growth. Specifically higher density areas of apartment buildings and terraced houses are proposed at the core of the masterplan, focussed around new and existing green travel routes and proposed local centres. At the fringes of the masterplan, density reduces with a greater 	<ul style="list-style-type: none"> As an example of how dwellings per hectare equates to types of dwelling, Greendykes South has been analysed which is a development site being progressed by Taylor Wimpey located in the south-east of the city. The development will comprise 59% terraces, 34% apartments and 7% being a mix of detached and semi-detached housing. This is viewed as a particularly high density suburban development but only equates to 60 dwellings per hectare. Requiring vertical mix of uses will have limited applicability. Increasing density to deliver more dwellings on fewer sites is not sound reason to avoid releasing additional housing land. Some representors see the fact that less greenfield land needing to be released is a significant positive aspect of increased density. Sites also may not come forward over concerns that the scale of density required could not appropriately fit within the landscape or townscape character of the site and its surrounding area. Delivery will be harmed by this policy change, which should be a focus of LDPs as per Scottish Planning Policy. Density and services provision are also a financial consideration that will vary between sites. Whilst an increase in density may increase sales revenue and 	<ul style="list-style-type: none"> There is no explanation of the term vertical mix. What it will give in terms of meeting the needs of the market? Does vertical mix of uses mean housing above ground floor commercial uses? It should be clarified this policy will not apply to sites that have planning permission or planning permission in principle. The standards should also not be applied to proposals submitted prior to adoption of Cityplan. Possible tensions between business and residential uses in terms of amenity and building/fire regulations. Vertical mixes of uses should be focused around particular centres and nodes where commercial occupiers would locationally need them and where their operations can complement residential uses. A requirement for vertical mix use in areas where there is a lack of demand for such a use could lead to an overprovision of commercial / retail uses in areas where there is simply no demand and which could lead to vacant units.

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<p>proportion of terraced housing complemented by semi-detached and detached dwellings. This creates a softer edge to the existing and proposed green buffers and landscaped areas.</p> <ul style="list-style-type: none"> • This option, as with Choice 2 more generally, should explicitly link to the City Mobility Plan’s mention of Mobility Hubs. Through provision of structured shared mobility with links to public transport connections, there is potential to reduce space required for private parking and increase extra floorspace within dwellings which is important for mental health, encourage longer tenure and thereby create stronger communities. The need for liveable space within dwellings should not be overlooked when considering density. • The policy must also be applied to commercial developments to prevent low density retail parks for example that inefficiently use land and encourage unsustainable travel . • Dense developments must be done with care to avoid a detrimental impact, however it is noted that well-designed, taller buildings can also create vibrant, exciting city centre Some comments state denser developments should be capped at traditional 4 story 	<p>community services provision, land value revenue accounting works when land can be developed allowing site values which can be ‘shared’ through community deductions.</p> <ul style="list-style-type: none"> • Existing policy and Edinburgh Design Guidance (and SESplan) are adequate as they relate to the individual circumstance of a particular site and locality. • Policy on open space is rigid (particularly on private amenity space). If this were more flexible then the imposition of minimum density standards would become more deliverable. • In light of Coronavirus, the provision of high density housing has to be considered very carefully. Some argue more homes, or all homes, should have access to gardens. Shared stairwells, lifts and corridors inherently cause issues. • This will increase pressure on local infrastructure, services, amenities and green/blue spaces. Increases in density should only be permitted where there is a corresponding percentage increase in green spaces, amenities and infrastructure . • Much relies currently on the bus system. This is good, but is already overloaded. Conversely others note public transport may see a fall-off in use due to the 	<ul style="list-style-type: none"> • Suggest that minimum densities are replaced with requirements to demonstrate that development proposals offer the most efficient use of land taking into account site-specific technical considerations and local context. • This will be a significant policy shift that planning officers must be prepared to discuss at pre-app stage, providing quantitative advice on density, scale and massing. • Many developers have a particular standard product in mind. Built in volume significantly reduces build costs and therefore price point Those products are also direct response to what people expect to get for their money. Consequently it is argued increasing densities, and thus house types, would impact on housing delivery. It has suggested a compromise density between current densities and 65 dwellings per hectare would allow the market and customers to adjust, with increases in density phased in over the longer term. • Will this apply to just private dwellings or to short term lets and student housing etc.?

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<p>tenement level, although some recommend a cap of 5, 6 and 7 storeys.</p>	<p>crowded nature of the buses, trains etc, so this policy will need some serious re-examination.</p> <ul style="list-style-type: none"> • This will just further restrict spacious housing as only being affordable to the rich. The net effect will be to accelerate social inequality in the City. • putting people too close together breeds contempt, resentment, hostility and discomfort. social isolation, crime, anti-social behaviour, loneliness, mental health problems, deprivation and all the social problems we have come to associate with high rise developments where there is no access to local facilities for shopping, work and entertainment. At a minimum one comment suggested that <i>all</i> dwellings must have covered balconies. • Are minimum development densities really a problem? Developers will generally seek to make sure they realise as much density/value as possible out of a site. It is imagined that the density issue goes the other way and that it is the quality of a development that needs more regulating (sufficient space/soundproofing between dwellings and appropriate levels of greenspace are provisioned for). 	<p>Opposition to it being used to create more short term lets in particular.</p> <ul style="list-style-type: none"> • With lower ceilings to conserve heat, maybe 5 storeys could fit into what was only 4 before. • We must be open to reducing density in some over populated areas and getting a better spread of population across our city • How would this be enforced? Policy could include better communication with local communities to ensure the policy is working as intended - regular review. • COVID-19 and the inevitability of pandemics in future as well as living with novel coronavirus in the intermediate term, makes it unclear as to what a healthy urban density is • Where higher density can be shown to serve the needs of a community then it should be allowed, however sufficient daylight must be maintained to properties.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	<ul style="list-style-type: none"> • high density housing works in the city centre where sites are limited, land prices are high; perhaps less so at the edge of cities. • Not everyone rides a bike or takes a tram / bus to get to work. Some people just like living in Edinburgh and may work too far away to commute in this way (or at inconvenient times / shifts etc. • The higher densities proposed mean city centre will be unavailable for families. I think mixed use is desirable, rather than enclaves of the wealthy/ young/elderly. • Density has a detrimental effect on indoor air quality as well as congestion, traffic and pollution outdoors. • There is too much intensity of development and skew of property prices/ land value in certain areas. 	<ul style="list-style-type: none"> • Making sure this dense accommodation is affordable would make this policy acceptable • Other solutions can create additional housing stock are suggested instead/alongside increasing density. These include: using short term lets for proper residential, converting retail to residential, converting student accommodation and office accommodation – all of which should happen now in light of Covid 19. increase density in existing structures. Simplifying the planning restrictions around loft conversions in tenements

2C. We want to revise our design and layout policies to achieve better layouts for active travel and connectivity. To do this we want to ensure that the places, streets and road layouts we create in development reflects our Street Design Guidance and the six qualities of successful places in Scottish Planning Policy in that they are safe and pleasant, easy to move around, are welcoming; adaptable, and are resource efficient

Total responses - 798

Agree 85% (682)	Disagree 15% (116)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Forms part of blue-green network. all development must consider how water will be managed and flood risk avoided. Improve levels of wellbeing of students and residents, for example allowing young children to play outdoors. This is part of a sustainable environment and good placemaking. This improves health, including respiratory illnesses resulting from increasingly air-tight housing. This help students' links with the local community. This is important as they often return home without understanding of the local culture. This can improve the local economy and tourism. This must be high quality open space and public realm, it should largely 'natural/open' with trees. A large multi-use communal area can be more useful and attractive than individual small gardens. Space provided should improve active travel and public transport infrastructure. 	<ul style="list-style-type: none"> This approach is too broad and not based on evidence. It is not realistic on every site and may deter good development proposals, for example the reuse of a derelict building in a constrained area. This could adversely affect a main stream investment asset class is that the quality and design of its places and properties have improved and which attract students to Edinburgh, including after graduation. Policies should avoid being overly prescriptive and therefore be criteria based and take account of surrounding character /uses (including existing open space in the area) to deliver the six qualities of successful space as directed by Scottish Planning Policy. Account should also be had for the differing nature of end-users of different developments. A blanket approach reduces choice for the community. Reference is made to planning decisions supporting this view. Many people would rather have private gardens instead of larger shared spaces. The stated objectives conflict with one another. Developers could exploit the contradictions between high density requirements (2B) and this proposal (2D) and many developers have questioned if both aims 	<ul style="list-style-type: none"> Proposition is too vague. Clarity on ownership and responsibilities towards the new areas of open space are essential to avoid neglect and degradation. Much will depend on the detail of the policy, for example will it apply to urban as well as greenfield sites? It will be important that policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks will create uncertainty and add complexity and risk to the planning application process. It will backload the important process of prioritisation to the planning application stage. Open space must also be generally public space, and with as few exceptions as possible be available 24/7 for all to exercise their rights and freedoms (yes, including rough sleeping etc). Others however argue the opposite, particularly on flatted and affordable

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Agree 85% (682)	Disagree 15% (116)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Part of ensuring housing density meets demand. • This is part of shift away from car use so that the limited ground space does not become overrun with congestion and car parking • Support from University of Edinburgh as it helps students to interact and build communities whilst forming part of safe and accommodation. • Spaces should not be plain lawns that are difficult to maintain. Food growing instead for example encourages use, teaching, community bonds across ages and provides good sustenance. • Student housing should have to meet the same criteria for internal and external open space as normal housing, ensuring its future adaptability to meet other housing needs as markets change. • Should such a policy be brought forward, there is a requirement within purpose built student accommodation that a percentage of open/amenity space can be internal to a building, rather than simply external. The internal areas however are not classed as open space however they provide a similar function in that they provide spaces for students to use when not in their rooms or flats. It is these internal spaces which 	<p>can be met. Questions over the calculation of any minimum density in the context of whether this is calculated on a gross or net basis would be significant in being able to provide sufficient open space as well as retain offices and then provide other infrastructure such as schools etc. This would be especially difficult for confined brownfield sites.</p> <ul style="list-style-type: none"> • Some have noted this proposal for open space (2D) should take priority over density where both cannot be met. If both 2B and 2D have to be met then interior space may suffer and this may conflict with the character of existing community/area. • Do not agree with the inclusion of drying space as a particular requirement. • City Plan 2030 should continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. • It is important that the Council look at all of these in the round to arrive at a view of how this will affect delivery of development, in terms of timing and numbers, and ensure that this is reflected in the programming of sites in the supply to ensure the 	<p>housing developments, where residents require a safe enclosed space for their children to play and for clothes drying. Semi-private drying greens are part of the Scottish housing vernacular and should be encouraged.</p> <ul style="list-style-type: none"> • A consistent approach should be applied to not just private housing developments but affordable and indeed student housing, although it is noted open space/public realm would not be appropriate in certain types of development such as industrial or retail warehousing. In these locations it would be unlikely to be useable. • The proposed option is broadly supported but should perhaps not be mandatory. • Combining art with the outdoors, which can also include creative planting and lighting schemes, can help to better create a sense of place and transform landscapes. The Council should support this more in policy terms.

2C. We want to revise our design and layout policies to achieve better layouts for active travel and connectivity. To do this we want to ensure that the places, streets and road layouts we create in development reflects our Street Design Guidance and the six qualities of successful places in Scottish Planning Policy in that they are safe and pleasant, easy to move around, are welcoming; adaptable, and are resource efficient

Total responses - 798

Agree 85% (682)	Disagree 15% (116)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>help deliver an overall attraction to students over and above other types of accommodation such as HMO's.</p> <ul style="list-style-type: none"> This can be achieved by taking account of new suggestions for design, for example, flat roof gardens. Removing spaces devoted to car parking is another 	<p>required minimum 5 year supply is maintained at all times. It is possible that, when reflected in the programming, this prompts a need for additional sites to be identified to maintain that supply and to avoid departure applications in response to a failing land supply that increases uncertainty for communities and the Council. An urban area only approach cannot be achieved with the policy aims set out.</p> <ul style="list-style-type: none"> LDP policy on open space provision should identify localities where no open space is required to support higher density housing as to do so would undermine place making objectives and risk the delivery of housing. The policy should explicitly exclude those locations from the open space requirements. Some support drying spaces however others argue drying spaces often encourage enclosed green spaces which limits how it can connect to other active transport/ play needs etc. Others note that drying space is something hardly anyone wants or uses. Inside drying needs to be priority instead - outside drying is only really possible between May – Sept (and even then many areas get insufficient sunlight). However term times are October to May so they are pointless. Drying areas can be done in well-ventilated 	<ul style="list-style-type: none"> Consideration must be given to practical aspects that may cause conflict, such as proximity and noise . Disagreement over whether space is needed for students (with it also noted students can cope without drying space and have university facilities but others feeling student housing is especially in need of space. Clearer definition on what is counted as useable open space. Often one metre strips with little function are counted. Instead spaces should be attractive with a particular benefit/function so to be useable. For instance, structural landscape, seating, street furniture, paths, play, exercise and other recreational facilities, etc. Rubbish collection areas are often inadequately considered, resulting in litter blowing into surrounding area.

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Total responses - 798

Agree 85% (682)	Disagree 15% (116)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	<p>cellars and basements, which should be mandatory for all new high density developments to encourage efficient land use.</p> <ul style="list-style-type: none"> Community appliances (i.e. washer machines, dryers, tools, ladders, etc) that serve a community are better than everyone in the community having one each. 	

2D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, whilst allowing for higher densities

Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Forms part of blue-green network. all development must consider how water will be managed and flood risk avoided. Improve levels of wellbeing of students and residents, for example allowing young children to play outdoors. This is part of a sustainable environment and good placemaking. This improves health, including respiratory illnesses resulting from increasingly air-tight housing. 	<ul style="list-style-type: none"> This approach is too broad and not based on evidence. It is not realistic on every site and may deter good development proposals, for example the reuse of a derelict building in a constrained area. This could adversely affect a main stream investment asset class is that the quality and design of its places and properties have improved and which attract students to Edinburgh, including after graduation. Policies should avoid being overly prescriptive and therefore be criteria based and take account of 	<ul style="list-style-type: none"> Proposition is too vague. Clarity on ownership and responsibilities towards the new areas of open space are essential to avoid neglect and degradation. Much will depend on the detail of the policy, for example will it apply to urban as well as greenfield sites? It will be important that policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting

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Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • This help students links with the local community. This is important as they often return home without understanding of the local culture. • This must be high quality open space and public realm, it should largely 'natural/open' with trees. • Space provided should improve active travel and public transport infrastructure. • Part of ensuring housing density meets demand. • This is part of shift away from car use so that the limited ground space does not become overrun with congestion and car parking. • Support from University of Edinburgh as it helps students to interact and build communities whilst forming part of safe and accommodation. • Spaces should not be plain lawns that are difficult to maintain. Food growing instead for example encourages use, teaching, community bonds across ages and provides good sustenance. • Student housing should have to meet the same criteria for internal and external open space as normal housing, ensuring its future adaptability to meet other housing needs as markets change 	<p>surrounding character /uses (including existing open space in the area) to deliver the six qualities of successful space as directed by Scottish Planning Policy. Account should also be had for the differing nature of end-users of different developments. A blanket approach reduces choice for the community. Reference is made to planning decisions supporting this view.</p> <ul style="list-style-type: none"> • Many people would rather have private gardens instead of larger shared spaces. • The stated objectives conflict with one another. Developers could exploit the contradictions between high density requirements (2B) and this proposal (2D) and many developers have questioned if both aims can be met. Questions over the calculation of any minimum density in the context of whether this is calculated on a gross or net basis would be significant in being able to provide sufficient open space as well as retain offices and then provide other infrastructure such as schools etc. This would be especially difficult for confined brownfield sites. • Some have noted this proposal for open space (2D) should take priority over density where both cannot be met. If both 2B and 2D have to be met then interior space may suffer and this may conflict with the character of existing community/area. 	<p>applicants with an irreconcilable set of policy asks will create uncertainty and add complexity and risk to the planning application process. It will backload the important process of prioritisation to the planning application stage.</p> <ul style="list-style-type: none"> • Open space must also be generally public space, and with as few exceptions as possible be available 24/7 for all to exercise their rights and freedoms (yes, including rough sleeping etc). • Others however argue the opposite, particularly on flatted and affordable housing developments, where residents require a safe enclosed space for their children to play and for clothes drying. Semi-private drying greens are part of the Scottish housing vernacular and should be encouraged. • A consistent approach should be applied to not just private housing developments but affordable and indeed student housing, although it is noted open space/public realm would not be appropriate in certain types of development such as industrial or

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Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Should such a policy be brought forward, there is a requirement within purpose built student accommodation that a percentage of open/amenity space can be internal to a building, rather than simply external. The internal areas however are not classed as open space however they provide a similar function in that they provide spaces for students to use when not in their rooms or flats. It is these internal spaces which help deliver an overall attraction to students over and above other types of accommodation such as Housing in Multiple Occupation. 	<ul style="list-style-type: none"> Do not agree with the inclusion of drying space as a particular requirement. City Plan 2030 should continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. It is important that the Council look at all of these in the round to arrive at a view of how this will affect delivery of development, in terms of timing and numbers, and ensure that this is reflected in the programming of sites in the supply to ensure the required minimum five-year supply is maintained at all times. It is possible that, when reflected in the programming, this prompts a need for additional sites to be identified to maintain that supply and to avoid departure applications in response to a failing land supply that increases uncertainty for communities and the Council. An urban area only approach cannot be achieved with the policy aims set out. LDP policy on open space provision should identify localities where no open space is required to support higher density housing as to do so would undermine place making objectives and risk the delivery of 	<p>retail warehousing. In these locations it would be unlikely to be useable.</p> <ul style="list-style-type: none"> The proposed option is broadly supported but should perhaps not be mandatory. Combining art with the outdoors, which can also include creative planting and lighting schemes, can help to better create a sense of place and transform landscapes. The Council should support this more in policy terms.

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Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	housing. The policy should explicitly exclude those locations from the open space requirements.	

Choice 3 – Delivering carbon neutral buildings

3A - We want to require all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. We will continue to require at least 50% of the carbon reduction target to be met through low and zero-carbon generating technologies

Alternatively we could require buildings and conversions to meet either the Gold, Silver or Bronze standard (Bronze is the current minimum) as set out in the current Scottish Building Regulations

Total responses - 748

Platinum 63% (469)	Gold 18% (135)	Silver 7% (51)	Current 12% (89)	
Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
<ul style="list-style-type: none"> Energy use in buildings in Edinburgh accounts for a significant proportion of all citywide carbon emissions and energy us. Platinum standard must be met for the Council to achieve the net zero carbon emissions as set by the Council’s declaration of a climate emergency, the commitment to a zero carbon city by 2030 and the targets set by Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. 	<ul style="list-style-type: none"> No justification for this proposed policy. Not achievable. Even many highly serviced buildings such as research institutes and laboratories are challenging at this stage to deliver as Carbon Zero. A range of figures have been given for the additional capital costs for platinum: ranging from 10-15% and £40-£50'000 per dwelling. Others note this is simply 			<ul style="list-style-type: none"> Replacing a building has significant energy, carbon and cost implications. The retention of existing building stock is preferable when energy and carbon performance can be improved to reasonable level. Funding would go further it were directed toward funding towards improving energy

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Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
<ul style="list-style-type: none"> • Current developments appear to have met the lowest possible environmental standards, with a slow progression in building standards to adapt to climate change. Edinburgh lags behind other UK and European cities, with Glasgow for example requiring gold standard to be met since 2018. This may now mean relatively recent buildings now need to be razed. Buildings should meet the highest possible standards. • City of Edinburgh Council can become exemplar for others and shows ambitious targets can be achieved. • This is supported as it means the installation of sustainable surface water management systems at property level such as green roofs, water butts, rain gardens, porous paving etc. whilst minimising impermeable surfaces and the volume of surface water entering piped systems. Water saving at times of scarcity is another important consideration. • Opportunity for Council to promote development of existing major City Centre buildings with 'green walls or roofs'. • Supportive however it is important that high standards are implemented as appropriate to each building in 	<p>unknown and likely to be high. This is especially problematic given the present economic uncertainty resulting Covid-19 and the other additional costs being imposed by Cityplan e.g. 35% affordable housing as well as rising construction costs and ongoing costs like VAT. CEC needs to do further work on the additional cost for increasing the standard (e.g. Platinum, Gold) for each aspect (e.g. water management) as well as whether supply chains can deal with these changes given this is also a concern.</p> <ul style="list-style-type: none"> • Raising the bar in Edinburgh might result in reduced and slower housing delivery in Edinburgh in turn affecting economic sustainability. It could also encourage some developers to adjacent Council areas instead. This housing is already undersupplied and too expensive for many in Edinburgh. Delivery and cost of affordable housing would also be reduced. • Some have argued that higher standards should only be applied to greenfield sites given brownfield sites are generally more sustainable in their locations already. Additionally, brownfield sites are mostly costly to develop and therefore any additional requirements would make these less likely to come forward thereby losing the benefits arising from their 			<p>efficiency of the existing housing stock, which has a far greater impact on emissions.</p> <ul style="list-style-type: none"> • Insufficient information set out in question. The term “platinum” standard requires further clarification. Platinum standard would create challenges as it has not been fully scoped out. The text under the sub headings in the current document is ‘not currently defined’ for all but Co2 emissions. • It is difficult to see how this transition can be made so quickly, including the carbon neutral status by 2030. Platinum standard should be transitioned in a step-by-step process. • Will this change affect only new applications? • Many have asked if this standard apply to conservations? Historic Environment Scotland note that, in some cases, exceptions or lower standards may be justified for converting listed, historic or other buildings of interest which could

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Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
<p>question, for example to avoid increases risks of cold bridging and interstitial condensation.</p> <ul style="list-style-type: none"> If we do not achieve platinum standard now (with trial and investment) then we are locking in complex and costly retrofitting problems which only increase the economic, environmental and social burden of tomorrow as upgrading will ultimately be needed soon in the context net zero emissions future. We should welcome the requirement for volume house-builders to innovate, thus increasing demand for new technology, bringing down costs and making zero carbon a reality. Should we be going further than making new buildings carbon neutral in order to off-set the fact it is often inherently impossible for many older buildings to be brought up to modern standards? The new policy should reference the benefits of a fabric first approach and the range of zero carbon technologies and approaches available to ensure carbon neutral buildings are delivered. The new policy should allow flexibility for future changes to standards which may increase in future. 	<p>location and other merits (e.g. contributing to the Council's preferred strategy) .</p> <ul style="list-style-type: none"> Aim for gold or silver as these improve the status quo but are more likely to be delivered. LDP policies should align with Building Regulations otherwise there is a significant risk that different Councils will have differing requirements. Housebuilders and their supply chains would find it almost impossible to work in such an ad-hoc and piecemeal policy context. There is also a benefit of national consistency to offer economies of scale and avoid costly complexity. This is not a planning matter. A new LDP policy causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource Planning cannot deal with the level detail required to demonstrate compliance with sustainability standard in Building Warrant, particularly given that all 8 aspects of sustainability need to be demonstrated to achieve the highest levels - each with its own technical nuances (e.g. space heating, water management). The 			<p>adversely affected. Section 7 of the Building Standards Technical Handbook expressly excludes conversions. There could be detrimental impacts from imposing standards on buildings they were not intended for. These changes would also impact on the viability of conversion schemes which were already more costly than new builds due to requirement for the use of traditional materials, specialist skills</p> <ul style="list-style-type: none"> Some argue relaxing heritage planning restrictions, for example for out-of-sight retro-fitted solar installations on existing houses (e.g. New Town roofs). What is more important, the 'look' of a building or the environment/comfort/cost? Others argue that policy should allow for different levels for different development - ae platinum for new build and silver for conversions / improvements of older properties

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Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
<ul style="list-style-type: none"> • The wider carbon savings benefits of the project as a whole are pertinent and should be taken into account also, rather than solely an emphasis on the building itself. • If this is not in their budget, some kind of financial support should be given to the developer. • These targets must be mandatory as they require up-skilling and will incur costs to developer which means they will not voluntarily be complied with. • Setting the target will drive standards in the building sector to innovate and will drive competition. it will also stimulate economic opportunities in the market which will drive down costs and increase the skillsets to improve low carbon designs and products to go further in future. • The carbon emissions involved in the construction process need to be also considered, including the 	<p>planning system is already not functioning efficiently due to a variety of pressures it has.</p> <ul style="list-style-type: none"> • Current Building Standards (such as Platinum, Gold and Silver) may become out of date as building standards are reviewed. Particularly so as any proposed Cityplan will only really begin to have an impact from circa 2024 onwards once permissions granted under the new LDP being to be completed. • New homes are now 75% more efficient than they were in 1990. Even since 2010 significant uplifts in Carbon Targets have been made in Building Standards. It is anticipated that further reductions in carbon dioxide will be required when building standards are updated in 2021 with further planned changes again in 2024 preventing the installation of gas boilers. Scottish Government is also phasing in EPC requirements for residential property. This makes setting a Platinum standard now unnecessary. • Further representations note the Scottish Government has set a policy of requiring net-zero buildings for consents from 2024 and so Edinburgh's policies should gradually build towards this. 			<ul style="list-style-type: none"> • .Des 6 is too complicated. • Other representors have noted clear guidance needs to be provided on how to achieve energy and sustainability items in listed or existing buildings. Some representors have noted however the need for flexibility in this regard to deal with these situations on a case-by-case basis. • Ensuring the delivery of the Platinum standard for buildings and conversions is one part of the whole systems approach which the Council will have to adopt in planning for the city's future energy and resources consumption. This will require clear policy direction across all Council areas, especially planning, with further collaboration between departments such as building standards and planning and better engagement with internal and external stakeholders to deliver the necessary innovation and solutions to achieve this. • Our understanding of much to do with climate change and different materials is changing so the highest possible standard

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Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
<p>production of materials and transport/assembly on site.</p> <ul style="list-style-type: none"> We will need to deliver on passivhausese that are carbon negative to help off-set the fact that some of the older housing will never become neutral. This will reduce cost to future home occupiers in terms of heating bills etc, which particularly helps poorer households. Edinburgh would take the lead on a global stage by committing to this, both earning it extra tourism revenue and making it a hub for green businesses, although some are concerned a lack of local expertise could cause business to be lost abroad. New buildings need to be designed and build to the highest standards are they can exist for 100 years or more. With regards to heating and hot water there needs to be terms that forbid the consumption of fossil fuels in 	<ul style="list-style-type: none"> The proposed Policy provides no baseline date upon which standards should be measured. Policy Des 6 Sustainable Buildings remains an appropriate policy for City Plan 2030, subject to amendments in the supporting text. Policy should state sustainability requirements as an 'aim' and/or allow exceptions where it can be demonstrated the requirements make a development unviable (with some stating that the next highest standard that can viably achieved then must be met). Others have noted the plan should explicitly set out where exceptions apply, for example where the buildings will inherently allow energy recovery. It has also been suggested higher levels are an aim and that 'incentives' should be offered to encourage meeting higher aims e.g. reductions from other financial contributions to infrastructure. This policy should include the need to upgrade homes which are being altered or extended given most emissions etc in Edinburgh will come from especially inefficient existing housing stock. Residents of these 			<p>now may not be as we come to understand the drawbacks of particular materials.</p> <ul style="list-style-type: none"> The requirement for storage space (for bikes/prams/ etc) would be better provided outside if possible. How can private landlords and housing associations be held to the requirement for home office space remaining as office space rather than as an additional bedroom? (especially important now in light of Covid-19). Also, 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. The requirement for a minimum level of study space will need to be reflected within the minimum floor areas within the Edinburgh Design Guidance. Request that some discretion is applied for water butts for all dwelling with private

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Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
<p>individual buildings. We must encourage better standards of insulation to prevent wasted heat, district heating, wind and solar and ground/air source heat pumps.</p> <ul style="list-style-type: none"> • Create comfortable homes rather than cold, drafty or damp houses which increase illness. • Aim high and you might settle on something satisfactory. If requirements get watered down at least it will be from a high starting point. 	<p>homes have money to upgrade given they are paying for extensions and alterations.</p> <ul style="list-style-type: none"> • it is not clear that this is feasible without a commitment to developments such as district heating. Rural areas do not all have mains gas so have to use oil/electric or calor gas. • most landlords will withdraw from the sector because it is too risky and too expensive to be in it and Second if the landlords stay they will be charging the tenants a large amount to be living in their properties. • How can this be enforced given many of the changes are internal or could change over the lifetime of a development? 			<p>gardens. Could the water butt be provided within a communal garden where this is provided in addition to the private patio? Some small patios or paved areas have limited space and there are is no (or limited) soft landscaping.</p> <ul style="list-style-type: none"> • How would new standards be applied, monitored and enforced? • This does not make any provision for charging points for electric cars. • Carbon accounting could be done where something like a section 75 agreement could be used to take money off those not meeting the platinum standard or with high embodied carbon or demolition waste, to build funds to improve the performance of existing buildings, or the energy infrastructure that serves them, would take us a step closer to addressing the bigger issues in a net neutral manner. • The most important thing is to insist on the reuse of already existing buildings. New

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Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			Comments / other issues raised
				<p>build is the worst carbon footprint whatever credentials it has. Removing VAT on conversions would help and putting VAT onto new builds (this is matter for UK government but it should be lobbied for).</p> <ul style="list-style-type: none"> • Set a standard that takes us towards net zero for 2040, but do not require it for 2030. • Forms of heating like log burners are meant to be carbon neutral but they destroy air quality for residents.

Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans in our communities

4A. 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, open space, biodiversity net gain and community infrastructure development should deliver		
Total responses – 766		
Agree 93% (715)	Disagree 7% (51)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Place Briefs done at the start of the process explain what is to come and ensure community buy-in. Place Briefs help convey the priorities and needs of local communities. The community may raise issues but they also suggest solutions and can offer insights to bring forward better planned developments. This reduces community frustration at later planning application stages as communities input into decisions on these matters has been taken into account and communities can more clearly see how this has shaped things. Place Briefs are in line with the Place Principal. They can enhance the environment, historic assets, tackle air pollution, address contamination, incorporate drainage system. They should account for design, landscape, views/ vistas to surrounding areas, tree/woodland planting, energy use, path systems, biodiversity, layout, transport, amenity spaces, sport/leisure, growing space and access 	<ul style="list-style-type: none"> Place Briefs will just generate local objections delaying and preventing investment, good design and layouts. If Place Briefs are to be done they must be done on the understanding that development is needed for homes, business and economic growth. Otherwise there will be unrealistic expectations and/or unachievable outcomes. Policy Des 2 Co-ordinated Development remains an appropriate policy for City Plan 2030 subject to amendments in the supporting text. One developer has suggested there should be an increase the requirement on developers to prepare Place Briefs. A further developer suggested further engagement with communities as an alternative. The Council will need to await the Examination Report before proceeding with Place Briefs to be certain what areas and sites they are to be working on to avoid aborted work, wasted resources and raised community expectations. The additional lead-in time for development arising from the additional need for Place Briefs (estimated at an additional 12 months) needs to be reflected in the programming of sites to establish if a 5 year supply is maintained at all times. 	<ul style="list-style-type: none"> Queries over how many Place Briefs are envisaged? Further questions then raised over where will the budget will come from There is no indication of how and when Place Briefs will be delivered. Effort should be made to deliver the Place Briefs before allocations are finalised. If they are to form part of the development plan this should be made explicit, and an appropriate timescale planned for. If they are to be material considerations the weight to be applied to them should be made clear in the LDP. Where will Place Briefs sit in the hierarchy of strategies, plans and policies? The relationship between Place Briefs and Local Place Plans needs to be explicit from the outset in terms of which mechanism has primacy and which shapes the other. There is potential for confusion and potentially even conflict between these.

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Total responses – 766

Agree 93% (715)	Disagree 7% (51)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>to local food, education and healthcare infrastructure.</p> <ul style="list-style-type: none"> This is important for rounded communities with identity and social cohesion which contribute to physical and mental health and provide high quality spaces for work, life and play. Edinburgh has the potential to be a series of nodes that are strongly connected with each other, allowing these 'mini-centres' to feed off each other, thereby becoming more vibrant. Briefs are essential to delivering on the preferred urban area strategy and policy approach. The Place Standard Tool could be a useful resource with local communities. It will be essential that developers and landowners are involved in the creation of design briefs with their own perspective on site development and associated costs. This will help to avoid creating complications, ransom strips or holding up development with impossible requirements such as requiring infrastructure delivery outwith land controlled by the developer. 	<ul style="list-style-type: none"> There is no legislative requirement relating to community involvement in forming Place Briefs and so they should just to be prepared by the Council and consulted on. Place Briefs allow developers to escape from their normal requirements and so policies need to be strengthened. Place Briefs will be skewed to particular topics such as active travel as perhaps indicated by Choices options. Communities will vie against each other (eg not wanting undesirable features in their own neighbourhoods) so some level of oversight/decision-making needs to be kept by qualified officers in local government. People have high expectations and are overly idealistic, without taking into account the realities of problems. There should be clear differential between any additional burden which development places on an area, and that which already exists. Planning officials should still be the main guides. However it is important they actually come and really look at the places that they are thinking of building. Visit at different times of day find out what it's like to live there good and bad. Councillors should do this too. 	<ul style="list-style-type: none"> For the meaningful and inclusive delivery of Place Plans considerable support will be required at community level if residents are to play an equal part in the preparation of Place Plans. The Council will need to provide additional funding for undertaking engagement and providing skilled resources (e.g. transport and biodiversity, HRAs etc.) to advise local communities when developing Place Briefs. A formal structure should be established setting how communities shall be involved in Place Briefs. The success of Place Briefs and their format should be reviewed as they are rolled out so as to refine the process. For larger sites the information produced should be more detailed, with a focus on development frameworks and draft masterplans, necessary to co-ordinate delivery of more complex place-making. Many representors have noted that Place Briefs should be a requirement for all sites. Some representors, mainly developers, have

4A. 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, open space, biodiversity net gain and community infrastructure development should deliver

Total responses – 766

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Service Providers such as Scottish Gas Networks need to be involved in the process to provide comprehensive information assessment where constraints and limitations are fully known, shared and accepted by all parties. There is concern constraints that are later found out could unravel Place Briefs. • There is benefit in bridging the gap between the LDP and Planning Applications. Site briefs should provide specific information as to how development areas should connect in and how they should contribute to the wider green network, including where necessary, through appropriate use of off-site contributions. • The process of being involved in Place Briefs will be a helpful process for communities who may in the future prepare a Local Place Plan. • City of Edinburgh Council must provide adequate finance, accommodation, professional guidance, and professional indemnity insurance for those involved. • Ensure alignment between area specific briefs and the policies of the LDP. 	<ul style="list-style-type: none"> • This will cost too much and represent excessive regulation. • There is a danger that this will magnify inequalities and more affluent areas tend to have people with more time and ability to take part. Community Council annual grant is insufficient to support this work. • There must be sufficient funding for time to pay for salary for a coordinator of the plan and out of pocket expenses (e.g. free transport) for those who would find it difficult to engage otherwise. • Place brief areas shown in the Choices document are excessively large in relation the areas shown as development proposals. They take in areas which are currently developed and do not need any place making. 	<p>argued that additional consultation are more important for larger, strategic sites and those which are complex/in multiple ownership. For less contentious major developments then there already statutory pre-application consultation that involves the community. It has been stated that Place Briefs should dovetail into existing pre-app processes.</p> <ul style="list-style-type: none"> • It is difficult to motivate people to participate in local consultations. Community Councils face difficulties in filling posts and in demonstrating that they can represent the community. Scottish Government's overruling of Edinburgh planning decisions raise concerns that local input carries little weight. Earlier lack of consultation with Communities on future developments which has created a lot of mistrust. All householders in an area must have the relevant information delivered to them in order to properly communicate/attend any meetings. • A formal structure should be established setting how communities shall be involved in

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<ul style="list-style-type: none"> • There should be no removal of local shops and small businesses to build more houses when this will be at the expense of local amenity, employment and access. Local people should have a say when widely used facilities are threatened with removal. • Give communities more opportunity to attempt "community right to buy" purchases on buildings that they feel would be best put to community use. • New development should include a place brief so that all local development in the area is tied together and is seen in the context of local village or town centre where all amenities are within 15 min walking distances. If this is not possible then people must be able to use low carbon transport where they need to travel further . • Through a series of meetings, workshops, surveys, and growth-scenario comparisons facilitated by local leaders, Place Briefs allow participants create a community vision—a written statement that reflects the community’s goals and priorities and describes how the 		<p>Place Briefs, with community groups involved in this. This should set out what extent of areas Place Briefs cover. The success of Place Briefs and their format should be reviewed as they are rolled out so as to refine the process.</p> <ul style="list-style-type: none"> • It has been argued that Community Councils should provide community input. Many others have noted communities have diverse views and that all parts of the community must be involved. This requires using innovative methods to involve those who are presently marginalized and under-represented. Suggestions to address this include workshops organised by the council as well as including local businesses, churches/place of worship, voluntary association. The Council should not treat an absence of consensus as grounds for it to act as arbitrator. • Briefs should cover all Council functions and responsibilities, including partnership arrangements e.g. Edinburgh Integration

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<p>community should look and feel in years to come.</p> <ul style="list-style-type: none"> Briefs should consider both existing and future residents. 		<p>Joint Board for Health and Social Care as a whole systems approach.</p> <ul style="list-style-type: none"> This should be an ongoing discussion, and the plans that are currently in development may well need reconsideration post Covid. There is little local community involvement in Pre Application Consultation led by developers and they will not always allow members of public enough scope to get involved. Developers should be required to facilitate more involvement.

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions

17 comments

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<ul style="list-style-type: none"> This bring benefits to local communities in terms of feeling that they have more say over future development proposals as well as creating a better sense of connection to their local area. 	<ul style="list-style-type: none"> It is important that local place plans facilitate and do not delay development in what already appears to be an overly-ambitious timetable for the delivery of housing. Issues relating to feasibility and viability need to be considered in accordance with the statutory provisions of 	<ul style="list-style-type: none"> Existing community engagement processes and activities with community-controlled organisations must be significantly strengthened and fully resourced. Significant support across community councils and organisations as well as developers that Local

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<ul style="list-style-type: none"> The new Planning Act enables Local Place Plans to be proposed by local communities and so proactive engagement by the planning service is essential. Local Place Plan's must be positively prepared, supporting growth to meet the identified need, and prepared within the current planning policy framework. Others argue that there should be no housing developments until LPPs are in place. Various key agencies (e.g. Historic Environment Scotland) have expressed support and willingness to engage with the LPP process and provide information to assist. The Place Standard tool is recommended for Local Place Plans to allow thinking about the physical elements and the social aspects of a place together in a structured way by asking a series of questions based on the evidence. This provides a framework for evaluation, for assessing the strengths and weaknesses and for prioritising areas for action to improve new and existing places. The standard should also include the importance of local food growing and access to it. 	<p>the Act the Circulars and Regulations. The success and failure of community involvement efforts in implementing Local Place Plans can be linked in part to a community's level of readiness and existing level of social capacity and of course, a willingness to engage to deliver rather than oppose development.</p> <ul style="list-style-type: none"> LPPs must not misinform the design, layout, and transport, education and healthcare infrastructure requirements needing to be delivered given there may be overarching city-wide coordination required. 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. As effective consultation with local communities can be difficult to achieve so the process needs to be fair and open in terms of options and agreed outcomes. There will be some areas in Edinburgh that have the readiness and capacity to undertake these Local Place Plans. However, there will be some that do not. Some Community Council's may be inactive and so some areas may not be represented. 	<p>Place Plan preparation is professionally supported (e.g. landscape, architecture, biodiversity etc) with specialist input including with up-to-date data. This is important to ensure communities are aware of what LPPs can influence.</p> <ul style="list-style-type: none"> A clear framework, process and timetable should be established for development of Local Place Plans. Several representations said community groups should be involved in deciding this methodology. One comment noted that not all LPPs will be identical in this respect so a standard template would not work. The triggers for which community bodies should be involved may not follow arbitrary boundaries. The Community Council should be seen as a partner and a key consultee - if not a statutory consultee - on all planning matters for their area. Many comments note participation needs to be wider than Community Council however and that many areas do not have a Community Council.

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<ul style="list-style-type: none"> • A revised version of the Place Standard tool will be launched in 2020 to address gaps in the original tool identified in a changing climate, including enhancements to better enable place-based conversations to address climate change and improve environmental sustainability. • Consideration of green and blue infrastructure should be encouraged. • Comment suggesting lots of local communities are keen to do Local Place Plans. Leith is underway with this process already. Many community organisations have also noted Communities have limited resources and time however. The introduction of Place Briefs, if a mandatory requirement, would cause for concern. • It noted there is a chance for enhancing skills and capacity in communities to compensate for officers who do not currently have the capacity to deliver the massively expanded network of walking and cycling routes, paths and related infrastructure. 	<ul style="list-style-type: none"> ○ Conversely however it is argued at present it is disadvantaged communities which are overrepresented with LPPs and that LPPs should be done for better-off areas too. • Community Councils and other local bodies are elected for a period of a few years and can change much of their membership accordingly and because they do not have a paid executive are unlikely to be able to provide the continuity desired. Council officers have to act quickly in order to see things are done within the period for which community council officers are elected. • Where will the Council funding and resource come from to support LPPs? How would the Council choose which ones to support if funding was limited? How many could be many coming forward? If every Community Council decided to prepare a Local Place Plan, as is its right, how would the Council respond to this? • LPPs should be more action focused than existing examples which seem lacklustre, devoid of inspiration and limited in scope. • There will also need for mechanisms for resolving areas of disagreement between communities and the Council. LPPs 	<ul style="list-style-type: none"> • Others have argued the best manner in which to engage with existing communities is through an existing landowner or custodian of a particular area. In particular they note the Council is not resourced to handle the additional workload • Local Place Plans will need to integrate with the statutory procedures and development management process. LPPs should be seen as a means of facilitating delivery and involving all key stakeholders in implementation - including landowners and developers - as well as key organisations and service providers. This is particularly relevant for the larger strategic land releases. It has been stated that LPPs development should include small business owners as well as other community members and all participants should have equal voting rights. • The new Planning Act indicates that Councils merely have to show 'due regard' for LPPs which could give them very little weight. Developers note that the LPP requires to adhere to the LDP so a new policy must take care in terms of the weight given to LPPs, with the purpose of LPPs should be to guide,

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<ul style="list-style-type: none"> Place briefs appear to be a good concept for delivering Local Place Plans, or have the flexibility to respond to them, in cases where the Place Brief is in place before the Local Place Plan has been developed. They should also be seen as a tool for education on important citywide issues. Evidence shows that providing increased awareness of options available amongst the community increases the buy-in to those options, in particular regarding innovative travel options. It has been suggested that the process to develop these plans should also include setting targets to 'work towards delivering a sustainable city' etc. LPPs should holistically consider infrastructure and amenity needs of an area at an early stage. This improves communities but also nurseries, libraries and small commercial units need to be created if smaller enterprises are to establish Edinburgh Council should set out that these plans will be taken strongly into consideration during decision making. 	<p>should not be prevented from happening because they do not match the views of council officers.</p> <ul style="list-style-type: none"> What if several LPPs are drawn up for one area? What if they do not comply with the LDP? LPPs must be constantly reviewed and updated, maybe every 6 months 	<p>not prevent development. Others note however this emphasises the importance of having an LDP that reflects the views and aspirations of the Edinburgh's communities in its high-level aims.</p> <ul style="list-style-type: none"> Conversely however it has been stated Council must fully take account of LPPs as one of the most important considerations in planning decisions in creating Masterplans, Place Briefs, in discussions with developers, and dealing with PANS and Planning applications. The preparation of the Local Place Plan may have the benefit of concentrating a great deal of discussion, argument, understanding and resolution in a very short time. It will be important however that the planning and design process come neither too early nor too late to inform subsequent stages of planning and development. What are the plans to find out what the 'community ambitions' are? Will these encompass the consultation already carried

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<ul style="list-style-type: none"> • Edinburgh Council should strongly consider Local Place Plans as a core mechanism for realising its climate and biodiversity objectives and surpassing them. • Officers should use a locale’s public transport and active travel routes so that they know the reality of what it is to travel and live in each community. • Link LPPs to participatory budgeting – given a share of local government money to vote on its use in relation to delivering the plan. o Community should be able to deliver aspects, not be in the back seat of development 		<p>out through the Local Outcome Improvement Plan?</p> <ul style="list-style-type: none"> • The ‘planners’ involved are from diverse backgrounds • There has to be better research of local demographic, historical significance of land/communities, infrastructure etc. • Guidance for ‘Local Place Plans’ is yet to be provided by the Government so further comment is not possible at this stage. • There has to be an end to the confidential and one-sided system of developer/planning office meetings, which are not open to public scrutiny or participation, nor are reciprocal arrangements allowed for residents or residents groups. This is undemocratic and has to be amended, to have all developer/council meetings minuted, and those minutes made publicly available. • A very wide range of suggestions have been put forward on how to engage on LPPs. There are too numerous to be listed here however

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		each suggestion has been recorded to take into consideration going forward.