

A city in which everyone lives in a home which they can afford

Choice 9 - Protecting against the loss of Edinburgh's homes to other uses

9A - Consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area'		
Total responses - 793		
Agree 87% (687)	Disagree 13% (106)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Damaging to well-being and community cohesion. It affects housing availability, affordability, amenity and has a knock-on effect of destroying local businesses. • Negative impact on hotels and Bed and Breakfasts. • Will help meet housing need based on existing stock and reduce the need to build in new areas. • Could create a better balance between short term lets and the resident population and aid better place making. 	<ul style="list-style-type: none"> • Would make it unaffordable for tourists and decrease revenue for local businesses. • Short term let control area should be everywhere. • Should be controlled through licensing and enforcement. • Perception of short term let numbers and actual data is often completely misaligned and this policy needs to be driven by data. • Practicality in terms of the resources of the Planning Dept to execute this should be considered. • Needs to be implemented nationally otherwise just pushes the problem elsewhere. 	

9B Create a new policy on the loss of homes to alternative uses.

Total responses - 793

Agree 88% (699)	Disagree 12% (94)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Short Term Lets impact on price and availability of housing, character of neighbourhoods and amenity. • Needed to protect housing for people to live in and bring housing back into use. • Should seek reasonable balance between economic benefits of tourism, adequate housing supply and quality of life. • Should be a presumption against a change to commercial use. • Should restrict Short Term Lets to those living on the premises. 	<ul style="list-style-type: none"> • Any restriction will make it unaffordable for tourists and result in decreased revenue for local businesses. • Overkill for any of the perceived issues surrounding short term lets. • Time consuming and therefore expensive. • May drive more people to opening up their spare rooms instead of letting out an entire home with no regulation. • Needs to be a recognition of the non-binary nature of properties in the city centre. • Create zones that allow a certain number. • Should be blanket ban. 	<ul style="list-style-type: none"> • Need to provide a mix of accommodation including hotels, youth hostels. • Consideration needs to be given to change-of use from retail to residential wherever possible.

Choice 10 – Creating sustainable communities

10A Revise our policy on purpose-built student housing		
Total responses - 726		
Agree 84% (609)	Disagree 16% (117)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Not an appropriate area for speculative building and should not be provided at the expense of housing. Should be based upon an evidence-base of the need. • Community concern over spread and potential negative impacts on neighbourhoods and availability of affordable housing. Should monitor capacity. • Need to consider overall requirement and demand for housing in the city from all sources, including visitors and students and specialist housing. • Current guidance is non-statutory and is seen as a weakness. Should be tenure blind and facilitate change of use. • Demand for student accommodation likely to decrease and should consider conversion to high-density, low cost starter homes. • Purpose built blocks are not easily adaptable to mainstream housing due to design. 	<ul style="list-style-type: none"> • Restricting development and management to Higher Education institutions is anti-competitive, they may not have the will or resources to meet demand and should not be obliged to take on management. • Limiting growth will exacerbate housing issue. Student accommodation is more efficient use of land and frees up existing housing stock. • Requirement to locate on a direct route is onerous and overly restrictive. • Housing should not be at the expense of student accommodation where there is a need. Existing policy has not limited windfall housing development within the city. • Differing locational requirement and potential conflict in life styles between students and housing. • Provision dependant on the scale of site and investment intention. Should be considered on a site by site basis and not restricted to housing. • Limit of 10% studio flats not evidenced and fails to acknowledge importance of future proofing. Should be driven by market and demand, may be smaller sites that provide a good opportunity to provide studios not suitable for a cluster model. 	

10A Revise our policy on purpose-built student housing

Total responses - 726

Agree 84% (609)	Disagree 16% (117)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	<ul style="list-style-type: none">• Should be no more student accommodation.• Adding 1 in 10 affordable homes within a student demographic is not sustainable.• All future student accommodation should be on university land.	

10B - Create a new policy framework which sets out a requirement for housing on all sites over a certain size

Total responses - 714

Agree 78% (560)	Disagree 22% (154)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Supports the formation of sustainable, mixed use communities. Housing must be on the same site. • Should include town and local centres, and office developments should not be excluded. Major developments should provide small-scale office and other workspace units. • Requirement should not be transferrable to another site . • Should be affordable/social housing only. • Need to consider biodiversity value of sites. 	<ul style="list-style-type: none"> • Would have implications on development viability and may damage the long term economic outlook. • Developers of residential are different to other commercial developers and hotel operators. • Should not apply to University Campus sites or University owned land due to viability. • No evidence for threshold of 0.25 Hectare. • Housing not always be appropriate and may not lead to good place making. Should be on individual site basis with the balance of uses not restricted to housing and should adopt a range of housing numbers not site area. • Inefficient use of land as housing has significantly more policy requirements and student housing provides greater density. • Vision for land use should be a mix of public realm use. • Do not believe the housing requirements have to be on the development site itself. 	<ul style="list-style-type: none"> • Unclear why policy is seeking additional residential housing over and above the evidenced-based requirement set out in Housing Need and Demand 2. If additional housing is required more land should be released. • Should not apply to Edinburgh Bio-Quarter as this would undermine the life sciences-led objectives. • Should be an embargo on new student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments in the World Heritage Site.

10C Create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres

Total responses – 674

Agree 84% (566)	Disagree 16% (108)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Housing complements existing retail floorspace and helps to best utilise available land and create sustainable mixed use communities within the urban area. • Will minimise travel needs and strengthen financial viability of centres and units. • Changes in retail may increase the number of vacant units and space could provide urban living, and footfall for businesses. • Promotional policy may encourage more mixed-use development, but not one that dictates that any redevelopment will require 50% housing. Policy should make specific reference to supporting proposals developing above existing single-use retail units and commercial units. 	<ul style="list-style-type: none"> • Should not seek to stymie the primary use on these sites, undermining future investment. • Should continue to adopt existing policy framework and amend Policy Hou 10 - Housing Development to support housing uses. • Should be broadened to include other land use proposals. Housing will not be appropriate in all circumstances. Consideration needs to be given to a site's physical ability to accommodate housing and associated requirements. • Undesirable to live in these locations • Loss of this type of facility likely to result in a greater need for current users and new residents to travel further for access to retail facilities, will result in the loss of local sources of employment and a greater dependence on commuting for work. • Might be more practicable to seek to remodel these type of developments to provide housing above the retail centres. 	<ul style="list-style-type: none"> • Could not be relied upon to provide any significant level of new housing supply. Will depend on site specific considerations and aspirations of owners. May be amenity conflicts and issues with deliverability. • Existing business and industrial estates could also provide housing and other uses. Greater flexibility should be applied to well-located sites. • Must be sufficient demand and infrastructure. Provision for sport and recreation should be considered within redevelopment including a community speedway stadium.

Choice 11- Delivering more affordable homes

11A Amend policy to increase affordable housing from 25% to 35%.

Total responses – 722

Agree 72% (518)	Disagree 28% (204)	Comments / other issues raised
Reasons for agreeing	Reasons for disagreeing	
<ul style="list-style-type: none"> • Appropriate ambition for Edinburgh and will help reach affordable homes target. • Must be effectively enforced. Should not be able to reduce the requirement and should require on site provision. • More achievable if a broader range of products were considered under the affordable housing description. • Should be even higher. 	<ul style="list-style-type: none"> • Unless the whole housing requirement is planned for and met, affordability issues will perpetuate, regardless of target. • Should have regard to cumulative burden of policy requirements. Should be considered on a site by site basis. May have an adverse effect on viability and reduce housing supply. • Should be 30% to ensure viability. • Needs to be a balance between affordable housing and not prohibiting market housing coming forward. • Should be set at national level. Regional variations could add uncertainty and create distortions in the market for new housing land. • Should identify other ways of delivering affordable housing where 35% is not achievable. Should allow contributions to developments elsewhere. • Currently failing to meet delivery of 25% and until this is achieved current requirement should remain. • Land values vary across the city and fluctuate over time. May be more appropriate to vary contributions in high pressured areas. • 25% should remain for urban brownfield sites. 	<ul style="list-style-type: none"> • Subsidised affordable housing is not the only policy lever necessary to address affordability. Focus requires to be on providing more housing of all tenures. • Would like to see more detailed and credible plans set out for addressing the overall tenure mismatch between supply and demand. • Definition of affordable housing should reflect the average wage or the Living Wage rather than a figure that relates to surrounding properties. • Explicit guidance required for developers on the maximum amount that affordable housing providers can pay for these units otherwise cost of additional developer levy will fall upon housing associations.

11A Amend policy to increase affordable housing from 25% to 35%.

Total responses – 722

Agree 72% (518)	Disagree 28% (204)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	<ul style="list-style-type: none"> • All development places pressure on the housing market and increases the need for housing, requirement should apply to all forms of development. • Need to take account of grant funding. Should be greater flexibility in definition of affordable housing in recognition of the range of alternative models for affordable homes. • Social housing should be prioritised. Affordable and social are not interchangeable. • Okay in brown field developments but could end up with 'ghetto' areas on estates. • Need a balance of homes, too many "affordable" homes not always appropriate or acceptable for the market. • 35% is likely to discourage people from purchasing. • Should let developers create separate sites. • Already surplus affordable homes. 	

11B Require a mix of housing types and tenures

Total responses - 689

Agree 78% (539)	Disagree 22% (150)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Justified by the need to ensure more affordable homes in sustainable environments. • Where there is evidence of housing needs of different types policy should address this. • Mix creates diverse communities. • Should achieve higher standards and quotas for accessible housing to futureproof housing stock for ageing population. • Should not be able to move the affordable or social housing provision offsite. • Build to Rent and the private rented sector are essential part of development portfolio of RSLs and can provide homes at a range of price levels with security of tenure. • Should support self build/collective approaches including for older adults. • Should include core and cluster supported accommodation. • Should have more emphasis on cohousing and housing cooperatives. • Should be a minimum 10% accessible homes. • Recognition should be taken of the permitted levels of local rents and affordability for certain types of property. • Should not dictate housing types which RSL's do not want. 	<ul style="list-style-type: none"> • Mix of tenure and types change over time. May result in plan being outdated early in its life span, stifle sites and have a negative impact on viability, delivery timescales and design. • Blanket policy makes no allowances for the differing demographics. • Should be market driven and enable developers to make off site contributions. • Should continue existing policy framework with strengthened guidance. • Detrimental to RSLs-changes to grant funding may have an impact on tenures that are deliverable. • Only the broad principles of Housing for Varying Needs supported as all criteria cannot be met. • Would constrain delivery on brownfield sites, on such sites City of Edinburgh Council as landowner could impose this outwith the planning process. • Affordable housing and council housing should be the aim. • Incapable of regulating this. • Should be distinct boundaries between private and social housing. 	<ul style="list-style-type: none"> • Addressed in density policy.

11B Require a mix of housing types and tenures

Total responses - 689

Agree 78% (539)	Disagree 22% (150)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none">• Demographically driven decisions will be better for the longer term than commercially driven.• Should allow for design exploration with the development - to ensure best possible development.• Should promote development of a modern "tenement" as this promotes communities.• Should be in keeping with the area.		

Choice 12 – Building our new homes and infrastructure

Total responses - 1170

12A	Option 1-Council/Partners/Urban Area	Option 2-Market/Greenfield	Option 3-Blended approach
	76% (889)	6% (65)	18% (216)
	Reasons		
	Option 1-Council/Partners/Urban Area	Option 2-Market/Greenfield	Option 3-Blended approach
	<ul style="list-style-type: none"> • Current housing study data does not justify further land release across the city. • Focus on density, reduced need to travel offers the best opportunity to create a resilient city. Preserves green belt and allows a more compact city, which is better for active travel and would minimise impact on strategic transport network. Only option that can provide for walking in accordance with the movement hierarchy as well as helping to deliver on wider sustainability objectives. • Use of green belt land should be avoided at all costs • A more interventionist approach could bring sites being held for development forward. • Support development driven by the Council's plans and budget, rather than by housing targets set by the Scottish Government. • Concerned about the impact on small-scale light industrial and retail uses. 	<ul style="list-style-type: none"> • Estimated cost of delivery and impact are less than with the other two options and so should be regarded as the least financially challenging option. • Even the lower number of market housing will be challenging within existing infrastructure and environmental carrying capacity. • Housing Study not robust. Should not be relied on to allocate sites. All sites in urban area should be considered suitable in principle, subject to detailed assessment. Empty sites in the centre of town should be prioritised for affordable rather than private housing. • Release of green belt is critical to deliver the required housing. Provides appropriate flexibility for a variety of housing types to come forward within the Plan period. • Option 1 puts pressure on City of Edinburgh Council and the housebuilding industry to deliver housing within constrained brownfield sites – therefore jeopardising future growth, fails to meet essential housing need and demand and would disregard opportunities to develop suitable and sustainable greenfield sites with an appropriate programme of phasing. 	<ul style="list-style-type: none"> • Brownfield alone does not have the flexibility to deliver affordable, varied housing stock. Green belt release necessary. A dispersed growth approach would allow multiple sites to come forward at the same time. • Would ensure housing need can be met in full and allows for the benefits of new development to be accrued by existing communities and support existing services. • Option 1 has the potential to introduce further constrained sites into the housing land supply, presenting a risk that the housing supply target will not be met. There is no development strategy that demonstrates which sites it is expected will contribute to the housing supply target. Land owners may not share the aspirations of City Plan for their sites and others are at an early stage, delivery in the plan period cannot be relied upon. Expense of Compulsory Purchase Order would mean there would be little or no uplift in value through change of use to

	<ul style="list-style-type: none"> Other options would result in considerable scale of development on the edge of the city, loss of agricultural land and impact on the strategic road network and housing market of surrounding areas. 	<ul style="list-style-type: none"> Would risk a housing land shortfall and result in complicated CPO delaying housing delivery. 	<p>residential, creating a heavy cost burden for the Council. Evidence presented in the Housing Study is fundamentally flawed.</p> <ul style="list-style-type: none"> Should be no more development along banks of Water of Leith including brownfield sites.
Housing Land Supply			
	<ul style="list-style-type: none"> Housing Need and Demand (HNDA) calculation is not precise and conclusions relating to the economic growth of the City are dated. HNDA2 is the most up to date robust assessment of housing need and demand. Basing targets on SDP1 and HNDA2 is open to question and interpretation. HNDA2 Housing supply targets should be disregarded as Scottish Government rejected SDP2 – SDP1 is still the development plan. Housing supply target bears no alignment to the evidence. None of the options meets all need and demand. Larger generosity allowance required for option 1. There is no redistribution strategy from other constituent local authorities to absorb the balance of homes from Edinburgh that may not be met. Unfortunate it hasn't been possible to proceed in discussion with SESplan partners, particularly given early work done developing a Regional Spatial Strategy. Conclusion that in the absence of affordable housing provision there is no possible substitute to addressing the identified affordable need identified in HNDA 2 and that it should be ignored is flawed. The housing target should be higher. Edinburgh is capable of delivering at above the average annual delivery rate of market homes assumed in the HST. Considered that constraints on the delivery of subsidised affordable housing is a reason for a downward adjustment. Do not support any of the options because none are likely to provide sufficient housing to meet Edinburgh's housing need and demand until 2032. Propose an alternative Option 3, which allocates much more land for housing than currently proposed. Greenfield areas identified would not meet target. Additional or alternative greenfield site releases are required and should be augmented with some smaller greenfield sites deliverable in the short term 		
Other issues			
	<ul style="list-style-type: none"> Object to inclusion of Inch Park- Proposal is short sighted and does not meet Council objectives. Object to inclusion of 227 Seafield Road and 383 Seafield. Owner has no intention of releasing the land for housing in the Plan period. Houses should not be built on the Westbank site. This site should be retained for leisure use and for use by the community. Concern from Network Rail in relation to some of the potential greenfield sites. Concerned about Block 31 off Alnwick Road. Why not encourage more development in other LA Areas? 		

		Supporting reps	Objections
12B	Proposed greenfield site - Calderwood	141	249
	Other Issues	Reasons	
		<ul style="list-style-type: none"> On current transport access. 	<ul style="list-style-type: none"> Lacks direct public transport and current active travel arrangements along the A71 are inadequate. Site has poor connectivity and little relationship with the City of Edinburgh. It is disjointed from the main development and would be linear development. Does not meet aim of locating new development in locations with infrastructure capacity, or where capacity can be provided. Ability to deliver additional infrastructure has not been demonstrated. Will result in no green corridor between Edinburgh and West Lothian. Will have a significant impact on landscape setting of Jupiter Artland and its designed landscape, would directly contravene the findings of the capacity study. Can't ensure no damage to biodiversity.
12B	Proposed greenfield site - Kirkliston	156	654
	Other Issues	Reasons	
		<ul style="list-style-type: none"> Would create a strong Green Belt boundary. Delivering a new secondary school would reduce travel. Good transport links and could be seen as a multi-dimensional hub. Train services to city centre possible after the Dalmeny Chord is established. 	<ul style="list-style-type: none"> Scale of development likely to be unsustainable, without a full-scale local plan for Kirkliston and major investments in infrastructure. Least sustainable option, having the greatest environmental impact, being the least carbon efficient, and costly to deliver the supporting infrastructure. Can't ensure no damage to biodiversity.

12B	Proposed greenfield site -West Edinburgh	145	284
	Other Issues	Reasons	
		<ul style="list-style-type: none"> • Housing Study identifies Norton Park as suitable for development. It is effective and deliverable and could contribute immediately to the housing land supply, Well contained and associated with Ratho. • Would support the creation of integrated mixed-use neighbourhoods with easy to access facilities and services. • Good access to public transport and further potential with proposed tram extension or bus rapid transit (BRT) to Newbridge and potential new rail / tram interchange at Ratho Station. 	<ul style="list-style-type: none"> • Strategic economic gateway to the city and corridor is part of arrival experience, key land uses should reflect this. Release of land for density volume house building would not be appropriate. • Premature of West Edinburgh Study. • Not in alignment with National Planning Framework 3. • Should continue to be safeguarded for eventual relocation of the Royal Highland Showground. Can't ensure no damage to biodiversity.
12B	Proposed greenfield site -East of Riccarton	147	263
	Other Issues	Reasons	
		<ul style="list-style-type: none"> • Identified in Housing Study as suitable for development and can assist in delivering much needed housing in the south-west of Edinburgh. • Will perform as in-fill and minimise commuting. • Already a community of student flats and the Oriam -makes sense to develop here. • On current transport access. 	<ul style="list-style-type: none"> • Site has local significance in terms of landscape setting and sensitivity, there are potential impacts on the greenbelt, poor public transport links and other technical and environmental issues are not considered • Concerned about impact on A70 and the Water of Leith corridor. • Density suggests buildings could be in the range of 4-8 storeys and unlikely to be in keeping with current settlements. May set a precedent for erosion of further prime quality agricultural land to the west. • Can't ensure no damage to biodiversity.

12B	Proposed greenfield site-South East Edinburgh	156	447
	Other Issues	Reasons	
		<ul style="list-style-type: none"> Provides an effective site which can be integrated with the existing settlement and brought forward without any significant barriers to development. Would be a logical extension to the city and takes advantage of the existing infrastructure. Will provide a sustainable community within walking distance of employment. Will perform as in-fill and minimise commuting, Will likely become more sought after as many departments of the university are due to transfer to the royal infirmary complex. Seems to have more concentration of commuter traffic so park and rides in these areas along with transport links would make travel to and from the centre a better option 	<ul style="list-style-type: none"> Scale of Green Belt release has potential to greatly diminish the physical and visual distinction between the City and the towns within Midlothian. Concerned about the potential number of units and impact on A720 City Bypass. New grade separated Sheriffhall roundabout and high voltage electricity power lines could sterilise parts of the allocation. Viability and effectiveness may be affected by additional cost of proposal for underground the power lines. Can't ensure no damage to biodiversity.
12C	Do you have a greenfield site you wish us to consider in the Proposed Plan?	<ul style="list-style-type: none"> Refer to accompanying map 	
12D	Do you have a brownfield site you wish us to consider in the Proposed Plan?	<ul style="list-style-type: none"> Refer to accompanying map 	