

City Plan 2030

Report of Conformity

September 2021

Report of Conformity and Schedule of MIR Consultation Responses

Introduction

When preparing a new Local Development Plan, the Planning Act requires that the planning authority prepares and publishes the proposed local development plan having due regard to consultation responses to a Main Issues Report (MIR) and set out how the plan’s preparation has complied with a Participation statement as set out in a Development Scheme.

This document sets out how City Plan was consulted upon and explains how the Proposed City Plan 2030 has had regard to the points raised in the MIR consultation. A summary of the responses is available in Appendix 1 with the full responses online at www.edinburgh.gov.uk/cityplan2030.

Main Issues Report – Choices for City Plan 2030

The Main Issues Report for City Plan was called Choices for City Plan.

Choices for City Plan was the main consultation stage in the preparation of the Proposed City Plan 2030. It set out the main choices for the new plan, including the Council’s preferred options for change and other reasonable alternatives. Choices for City Plan sought views on 16 main policy and development options that could be included in the plan.

The 16 choices for City Plan were as follows:

<p>A sustainable city which supports everyone’s physical and mental wellbeing</p> <ol style="list-style-type: none"> 1. Making Edinburgh a sustainable, active and connected city 2. Improving the quality, density and accessibility of new development 3. Delivering carbon neutral buildings 4. Creating place briefs and supporting the use of Local Place Plans in our communities 	<p>A city in which everyone lives in a home which they can afford</p> <ol style="list-style-type: none"> 9. Protecting against the loss of Edinburgh’s homes to other uses 10. Creating sustainable communities 11. Delivering more affordable homes 12. Delivering our new homes and infrastructure
<p>A city where you don’t need to own a car to move around</p> <ol style="list-style-type: none"> 2. Delivering community infrastructure 3. Creating places that focus on people, not cars 4. Supporting the reduction in car use in Edinburgh 5. Delivering new walking and cycle routes 	<p>A city where everyone shares in its economic success</p> <ol style="list-style-type: none"> 13. Supporting inclusive growth, innovation, universities and culture 14. Delivering West Edinburgh 15. Protecting our city centre, town and local centres 16. Delivering office, business and industry floorspace

Choices for City Plan Consultation

The Choices for City Plan consultation ran from the 31st January 2020 to the end of April 2020 using the Council's online Consultation Hub.

The following activities were used to raise awareness and encourage people to have their say during the Choices for City Plan consultation:

- Launch of consultation document
- Publicity to raise awareness of consultation and online engagement on Facebook, Twitter and LinkedIn
- Notification to 2000 groups and individuals on the project mailing list telling them how to comment
- 11 key stakeholder sessions for key agencies, primary schools and transport groups, and three topic seminars (one seminar was cancelled due to Covid-19 pandemic)
- 8 Drop-in sessions to allow opportunity to find out more about consultation proposals (one event cancelled due to Covid-19 pandemic).
- Staffed exhibitions in public places to raise awareness;
- 5 consultation hub surgeries to enable people to ask detailed questions and complete the survey online; and,
- Statutory advert and articles on the Planning blog.

Responses to Choices for City Plan consultation

The Choices for City Plan 2030 consultation received over 1,800 responses.

This compares to some 435 received at the same stage for the Main Issues Report which led to the current Local Development Plan. This figure includes petitions in relation to potential for development sites at Kirkliston and at the Inch Nursery in South Edinburgh. The City Mobility Plan consultation which ran jointly with it also received some 1,800 responses.

Social media statistics demonstrate that the consultation reached over 26,000 people, with over 1 million impressions (views, likes, engagement) on Facebook, LinkedIn and Twitter.

All responses were summarised and recorded. The summarised responses were reported to Planning Committee on Wednesday, 12 August 2020.

Giving due regard to the responses received

City Plan has been prepared with regard to each of the individual representations received.

There were a number of representations expressing similar views. However, there are also many issues where different and sometimes conflicting views have been submitted. Rather than providing a response to individual comments, this document sets out the regard that has been had to all written comments received to each of the 16 choices set out within Choices for City Plan.

This is intended to provide an understanding of how the range of comments on each issue has been taken into account in shaping the plan.

In filling out the questionnaire on Choices, respondents could answer all or any of the questions and support or object to individual choices. Therefore, not all respondents answered all questions, as reflected in the figures below.

The key policy changes, as set out in Choices are summarised below with an indication of the levels of consultation support or otherwise, with the full summary in Appendix 1.

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

This Choice included policy changes to deliver a city-wide green network, to require development to deliver blue and green infrastructure, water management, the use of open space, allotments and cemetery provision. The reasonable alternative was to retain current policies. The proposed changes were to:

- A. We want to create a new policy which will help connect our places, parks and greenspaces together as part of a multi-functional, local, city-wide, regional, and national green network. We want to develop and maintain a city-wide network of high quality and beautiful multi-use green spaces to increase our health and wellbeing, encourage more walking, cycling and sport, address climate change, have a positive impact on biodiversity and air quality, manage the water environment and create opportunities for food growing. New development will need to ensure it connects to and delivers this network, including connections to the wider regional green network.
- B. We want all development (including change of use) to include green and blue infrastructure. Where appropriate this should include trees, living roofs, and nature-based drainage solutions including, ponds, swales, rain gardens and ecosystem services as well as making best use of natural features in the surrounding environment.
- C. We want City Plan 2030 to identify areas that can be used for future water management within a green / blue corridor to enable adaptation to climate change.
- D. 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.
- E. 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.
- F. We want City Plan 2030 to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area.
- G. We want City Plan 2030 to identify space for additional cemetery provision, including the potential for green and woodland burials.
- H. 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.
- I. We could maintain our current policies on Climate Adaption and Greenspaces which require developments to deliver green infrastructure and open space. However, we do not consider

these policies to be strong enough to deliver the kind of change we want to make to Edinburgh’s environment.

J. We could not implement a new 5-hectare standard.

Response

Choice 1 - Making Edinburgh a sustainable, active and connected city		
Choice	Policy change	% support overall
1a	City wide green and blue network	90% (840/69)
1b	Onsite blue and green infrastructure	89% (809/91)
1c	Water management	95% (830/38)
1d	Poor quality or underused open space	81% (705/155)
1e	Extra-large greenspace standard	83% (720/148)
1f	New allotment sites	88% (771/97)
1g	New cemetery sites	70% (624/199)
1h	Open space maintenance – new requirement	83% (735/109)

This choice had a very high level of support from those who responded, with most choices receiving above 80% support, with those relating to the city-wide network and water management requirements receiving over 90%.

Those who did not support these choices did so due to, in summary:

- the lack of detail in the proposed green network,
- that some developments did not need green infrastructure,
- that green and blue infrastructure takes up space, this is a challenge in delivering the density aspirations and the proposals are incompatible with the wider goal of increasing housing stock in an affordable manner,
- that there should be a proposed water management strategy for the City,
- that the new 5ha park requirement is not compatible with higher density, and
- that maintenance should be dealt with on a case by case basis given varying circumstances.

The changes in Choice 1 are supported by both national and local policy drivers including Edinburgh’s Open Space Strategy, the new Vision for Water Management in the City of Edinburgh which sets out key principles of how the city should manage its water environment, considering the increasing severity and complexity of challenges facing Edinburgh arising from the Climate Emergency. Work is ongoing with Edinburgh’s Nature Network and the Green Blue Network project, with these showing the benefit of the City of Edinburgh and its new development being served by a coordinated network multifunctional green blue infrastructure.

The need for green and blue infrastructure has been balanced with the need to deliver housing at a density which supports services.

- **Choices A, B and C** - Several new subject policies and modified versions of existing policies are proposed to be carried forward from the Adopted LDP. These have embedded the requirement for new developments to link to, expand and enhance the City’s green blue network. This

includes embedding green and blue infrastructure within developments. Improvements to the City's green blue network are set out Plan in Part 4, Proposals.

- **Choice D** – A modified policy on open space more clearly sets out when open space is important for local communities and when it may be accepted for development, particularly having regard to the overall level and quality of provision available in the local area.
- **Choice E** - City Plan adopts an urban brownfield strategy and accordingly does not contain many larger sites, or greenfield release. Notwithstanding this, one example of a larger site where this standard would be applicable is West Edinburgh and City Plan sets out that this should have a cohesive open space covering at least 5ha that can be accessed by all within the development.
- **Choices F and G** - Allotment proposals have been included in this plan as several of these have been identified as likely to come forward in the lifetime of the plan, however this was not the case with cemeteries or burial sites, so these are not included in City Plan.
- **Choice H** – A modified policy on landscaping requirements sets out the requirement for maintenance arrangements to be agreed as part of planning applications.

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

This choice included policy changes to ensure improvements in the design of new development in Edinburgh, including the use of design statements to set out the sustainability of developments, a minimum design requirement and a requirement for new developments to deliver active travel and usable open space. The reasonable alternative was to retain current policies.

- A. We want all development (including change of use), through a design and access statement, 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.
- B. We want to revise our policies on density. This is to ensure that we make best use of the limited space in our city and that sites are not under-developed.
 - a. Across the city, on both urban area and greenfield sites, housing development must achieve a minimum of 65 dwellings per hectare.
 - b. Where identified in the plan, higher density housing development with a minimum of 100 dwellings per hectare will be required.
 - c. A vertical mix of uses to support the efficient use of land. This is to provide for and to maximise the benefits of being close to public transport services and along high-quality active travel routes, provided that the design of such developments is of a high quality, respects amenity, and is of an appropriate character.
- C. 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.
- D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, whilst allowing for higher densities.

- E. We could continue using our existing policy on housing density which seeks an appropriate density based on the characteristics of the surrounding area, not based on maximising the benefits of achieving higher densities and being close to high quality public transport services.
- F. We could continue to use our existing policies on development quality, site layouts, public realm and landscape, and on open spaces and private spaces. However, we do not consider these policies to be strong enough to deliver changes we want to make to the creation of new places in Edinburgh.

Response

Choice	Policy change	% support overall
2a	Expanded design statements	89% (726/83)
2b	Minimum density	63% (518/290)
2c	New development to deliver active travel	85% (684/118)
2d	New development to deliver open space	86% (689/102)

All but one choice received above 80% support.

The choice on density received some level of objection, with most responses stating that a minimum of 65 dwellings per hectare was too high. There was some objection to the use of expanded design statements as Planning policy which conflicts or goes beyond other statutory requirements causes confusion and delay and adds unnecessarily to costs.

Development in Edinburgh must create great new places and contribute to our existing communities. Our design policies are generally strong and are largely fit for purpose, however we recognise that we don't always achieve the best outcomes for our city. We want to ensure a consistent approach to how we determine applications for new buildings and places and revise our policies on accessibility, connectivity including on how sites are laid out, public realm and open space and water management.

- **Choice A** - New subject policies will require demonstration of measures being embedded into proposals to;
 - address climate change in terms of reducing emissions and increasing resilience,
 - ensure accessibility for all demographics and levels of mobility,
 - encourage all forms of active travel,
 - be adaptable for alternate future uses and be of sustainable construction.
 - However, instead of using expanded Design Statements to demonstrate compliance, Sustainability Statements are to be used instead.
- **Choice B** - Both site briefs and subject policy shall ensure a high level of minimum density and vertical mix of uses.
- **Choice C** – This has been addressed through modification and addition of several subject policies as well as the requirements set out in the site briefs for specific development sites.
- **Choice D** - A new subject policy has been created which shall mean open space will be required non-residential development.

Choice 3 - Delivering carbon neutral buildings

This choice set out a new requirement for buildings in Edinburgh to meet the platinum standard in Scottish Building Regulations, Gold, Silver and Bronze were also consulted upon.

- A. 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.
- B. We could continue to use our current sustainable buildings policy (Des 6) which requires buildings and conversions to meet the Scottish Building Regulations bronze standard. or,
- C. We could require all buildings and conversions to meet the silver standards as set out in the current Scottish Building Regulations. or, D We could require all buildings and conversions to meet the gold standards as set out in the current Scottish Building Regulations. We will also continue to require at least 50% of the carbon reduction target to be met through low and zero-carbon generating technologies in respect of B, C and D.

Response

Choice 3 - Delivering carbon neutral buildings		
Choice	Policy change	% support overall
3	Platinum standards	62% (471) (Gold 135/Silver 51/Bronze 92)

62% of responses supported the Platinum standard. Objections to this policy change focused on whether the standard would be achievable, whether it is a planning matter, that current Building Standards (such as Platinum, Gold and Silver) may become out of date as building standards are reviewed, and whether this policy can be enforced.

All buildings in Edinburgh must reduce their carbon emissions both through their design and use of low and zero-carbon generating technologies. To help deliver the Council's target to be carbon neutral by 2030 we think all buildings in Edinburgh should be built as net zero.

We will do this through revising our policy on sustainable building to support the Council's objective of a net zero city by 2030. The proposed subject policy on this issue requires highest applicable level possible across different aspects of Sustainability within the Building Standards. In relation to current Building Standards this equates to platinum for carbon emissions and gold for all other aspects.

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

This choice set out how we want to work with local communities on Place Briefs. The preferred choice is to prepare place briefs for areas and sites within the plan, highlighting the key elements of design and layout new developments should deliver, and support Local Place Plans for communities by setting out how they can help achieve great places and support community ambitions. The reasonable alternatives are to continue to use existing policy.

- A. We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, open space, biodiversity net gain and community infrastructure development should deliver.
- B. We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions
- C. We could continue to use our current local development plan policies on design to guide our development. However, we do not consider these policies to be strong enough alone to deliver the kind of changes we want to make to the want development to look and feel, and how development will help deliver the creation of new places in Edinburgh

Response

Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities		
Choice	Policy change	% support overall
4a	Place briefs - new requirement	93% (716/53)

Of the responses received, 90% supported the use of place briefs to help deliver new developments within Edinburgh.

Objections to this policy change stated that Place Briefs will just generate local objections delaying and preventing investment, good design and layouts, that 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.

Place Briefs are a tool which we can use to help us achieve the best outcomes for our city. Working with local communities we will develop Place Briefs to direct how we strong enough alone to deliver the kind of changes we want to make to the want development to look and feel, and how development will help deliver the creation of new places in Edinburgh and the infrastructure required to support them.

Local Place Plans aim to make planning more collaborative and inclusive. Local Place Plans are prepared by local communities and set proposals for revision: the development or use of land. Local Place Plans may also identify land and buildings that the community body considers to be of particular significance to the local area. The use of Local Place Plans will formally be implemented in the future through the Planning (Scotland) Act 2019 – this is likely to be part of the next round of local development plans. However, we want City Plan 2030 to consider how we support the creation of Local Place Plans by our communities at this stage, specifically in how we prepare our Place Briefs.

The preferred approach was partly carried forward.

- **Choice A** - City Plan will identify sites where Place Briefs shall be necessary prior to submission of planning applications, with modified subject policies also ensuring proposals should not come forward prematurely in these locations or other sites where a Place Brief is considered necessary.

- **Choice B** - Legislation on Local Place Plans is still to be finalised so it is not considered appropriate at this stage for City Plan to set out details about how LPPs should work within the planning process as this will be addressed by legislation in due course.

Choice 5 - Delivering Community Infrastructure

The preferred choice is to direct development to where there is infrastructure capacity, to set out where new community facilities are needed and to ensure they are well connected with active travel routes and public transport services. To co-locate community services, close to the communities they serve and to set out where new development will be expected to contribute towards new infrastructure. In addition, to stop using supplementary guidance and set out developer contribution policy within the plan. This approach is likely to have a positive effect in terms of encouraging the co-location of development with good health, social and recreational facilities, encouraging active travel and reducing the need to travel. The reasonable alternative is to retain current policies.

- A. We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements and investment in the services on offer.
- B. We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services.
- C. We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel.
- D. We want to set out where development will be expected to contribute toward new or expanded community infrastructure. We want to use of cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms.
- E. We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance.
- F. We could continue to use our existing policies on community infrastructure and developer contributions and finalised Supplementary Guidance on Developer Contributions. However, we do not consider these policies to be strong enough to deliver changes we want to make to the delivery of new infrastructure in Edinburgh.

Response

Choice 5 - Delivering Community Infrastructure		
Choice	Policy change	% support overall
5a	Infrastructure first approach	91% (708/63)
5b	New community facilities – in plan	95% (740/36)
5c	Co-location of services in local communities	92% (717/54)
5d	Developer contributions requirements – in plan	94% (712/42)
5e	Use of cumulative contribution zones	79% (533/141)
5f	Stop using supplementary guidance for developer contributions	86% (579/93)

Most choices had a strong positive response.

Objections to this policy related to:

- The collection of healthcare contributions.
- Education infrastructure solutions should be based on existing school catchments areas. The Council must future proof new schools to ensure the potential for expansion, otherwise new houses should not be built within that catchment.
- Centralised services are more efficient and provide a higher level of care. Localised services often lead to differences in quality between the services offered depending on the income levels in the area. e.g. dentists/GPs in certain areas, schools reflecting the income levels of the areas they are in. This can reinforce income related stereotypes and social stratification.
- Concern over the Education Appraisal accompanying Choices in its density assumptions and consequent overestimation of pupil rate, with infrastructure requirements significantly overstated. The Council must demonstrate that its approach to contributions meets the various tests in the Scottish Government Circular including the requirement that contributions need to relate to the proposed development and be proportionate.

The preferred approach was taken forward

- **Choice 5A, B, C** - City Plan sets out the Council's commitment to an infrastructure first approach and the delivery of 20-minute neighbourhoods. The preferred approach to community infrastructure was taken forward by updating the policy on Access to Community Facilities and aligning it to the aspiration for Edinburgh to be a walkable city with key community facilities within a 20-minute return trip. Analysis of the proposed plan's housing and mixed-use sites is based on an 800m trip. This approach is evidenced by a transport, education and healthcare appraisal to understand the level of community infrastructure required to support the growth and City Plan's spatial strategy. Both the above policy and the updated policy on Loss of Community Facilities require co-location of services to be considered wherever possible.
- **Choice D, E and F** – The policy on infrastructure delivery and developer contributions supports development only where there is sufficient infrastructure capacity or where the development can deliver the infrastructure necessary to mitigate any negative impacts.

Choice 6 – Creating places that focus on people, not cars

This choice recommended the way we assessed new development in terms of a shift from cars to walking, wheeling and cycling.

The preferred choice is a new policy that assess new development against its ability to meet targets for public transport usage, walking and cycling. Also want to use place briefs to set targets for trips by walking, cycling and public transport and this will determine appropriate parking levels to support high use of public transport.

This approach is likely to have positive effects in terms of encouraging the co-location of development with good health/social facilities, encouraging the use of cycleways and active travel

routes, reducing the need to travel and contributing towards protection and enhancement of open space as part of a green active travel network. The reasonable alternative is to retain current policies.

- A. We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes.
- B. We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport.
- C. We could continue to use our policy on the location of major travel generating development which currently only applies to offices, retail and leisure developments not housing.

Response

Choice 6 – Creating places that focus on people, not cars		
Choice	Policy change	% support overall
6a	Modal shift – new policy	82% (681/149)
6b	Using place briefs to set modal shift targets	72% (582/221)

Most responses supported a new policy in the plan to deliver this change and a large proportion supported including this requirement being set out in place briefs. Objections to this choice included: Not enough information on what targets will be derived from, justified and monitored, unclear how targets will be able to respond to changes in public transport timetables occurring during plan period, and place briefs should not be used to set targets.

City Mobility Plan (approved and published February 2021) has committed to establishing mode share targets for Edinburgh. City Plan has worked alongside City Mobility Plan to develop these targets. Since this work started, the Scottish Government published a nationwide target to reduce car kilometres by 20% by 2030. Edinburgh’s target now uses this as a basis for establishing its citywide mode share target.

The preferred options were taken forward in part:

- **Choice A** - The preferred option is in part taken forward through the site accessibility analysis work. Site briefs have been informed by analysis of accessibility by sustainable transport modes (PTAL score and walkability ratio) and this informs the level of parking that the site briefs set out in the development principles.
- **Choice B** - Criteria in the transport policies will all work together to ensure that new development works to achieve the Council’s mode share targets by establishing appropriate levels of parking and ensuring the location for major travel generating development are where there are high levels of access by sustainable transport. However, the policies stop short of setting out the targets themselves.

Choice 7 - Supporting the reduction in car use in Edinburgh

This choice sets out policy changes in relation to parking.

The preferred choice is to determine parking levels in new developments based on targets for trips by walking, cycling and public transport, protect against development of additional parking in the city centre to support delivery of the City Centre Transformation programme, update policies to support parking for bikes, those with disabilities and electric vehicles, support the city's park and ride infrastructure through extensions to them, and supporting new park and ride sites.

This approach is likely to have positive effects in terms of encouraging active travel, low emissions vehicles, travel by public transport, minimising the distance people travel and the benefits of good air quality that arise from less private vehicle trips. The reasonable alternative is to retain current policies.

- A. We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking.
- B. We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme.
- C. We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure.
- D. We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.
- E. We could continue to use our current policies on car and cycle parking which set minimum standards for car parking.
- F. We could continue to use our policy on Park and Ride site.

Response

Choice 7 - Supporting the reduction in car use in Edinburgh		
Choice	Policy change	% support overall
7a	Set parking levels in the city centre by targets for trips by walking, cycling and public transport	69% (554/248)
7b	Protect against new city centre parking	74% (583/204)
7c	Support parking for bikes, those with disabilities and EV	81% (650/150)
7d	New park and ride sites	89% (704/87)

There was strong support for cycle parking, parking for those with disabilities and electric vehicles and for park and ride sites. However, there was less support for setting parking levels in the city to encourage trips by walking, cycling and public transport. Objections included: if evidence base is not available, could lead to inappropriate levels of parking allowed and overspill parking, that those who

live outside Edinburgh need to use cars to get into work. Targets and supporting EV would be discriminatory, restricting city centre car parking simply pushes this out to surrounding areas, with consequential adverse impacts.

The preferred options were taken forward in part:

- **Choice 7A, B, C** - The preferred option has been taken forward in part by criteria that links parking levels with public transport accessibility levels, supporting private parking free developments in the LEZ and other highly accessible locations, other than accessible parking spaces. Updated policy proposes no new off-street parking in the city centre. Any parking is required to have smart EV charging. Another new aspect to this policy framework is the support for mobility hubs, which reduces the need to own a private car and encourages shared and sustainable transport options. Cycle parking policy has been updated to increase cycle parking security, convenience and for visitors.
- **Choice D** - Continued support for park and ride, with updated policy now including criteria to ensure integration with active travel network, mobility hubs and EV charging.

Choice 8 - Delivering new walking and cycling routes.

This choice looks at how we identify new cycle routes and where these routes should be. The preferred choice is to update policy on the cycle and footpath network to provide criteria for identifying new routes, as part of City Centre Transformation and other relevant projects, to assist in delivering a number of strategic walking and cycling links around the city, and to safeguard or add any other strategic active travel links within any of the allocated sites. This approach is likely to have positive effects in terms of encouraging active travel and the benefits of good air quality that arise from less vehicle trips. The reasonable alternative is to retain current policies.

- A. We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. This could include, but not be limited to, the following:
 - New cross-boundary routes that connect growth areas with strategic employment areas;
 - Local walking and cycling links around the city;
 - Connections between park and ride; and,
 - Public transport interchanges and the network of town and local centres and new development.
- B. As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals for the new plan to assist in delivering:
 - Completion of the River Almond Walkway
 - The A71 cycle super highway linking south Livingston with West Edinburgh.
 - Edinburgh Waterfront Promenade (realigned – Granton Beach through Granton Waterfront and Western Harbour to Ocean Terminal; Ocean Terminal to Leith Links avoiding operational port estate)
 - The Pentlands to Portobello link
 - Meadows to George Street
 - City Centre East-West Link

- Waverley Valley bridge link
 - Lothian Road
 - West Edinburgh Link
 - Roseburn – Union Canal
 - Lochend – Powderhall
 - West Approach cycle link
 - Pilrig Park - Pirrie Street
 - Link to Morevundale Road
- C. We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal or the City Mobility Plan.
- D. We could continue to use our existing policy on the cycle and footpath network which only states that planning permission will not be granted for development that prevents the implementation of the proposed cycle network, rather than ensuring that development delivers it.

Response

Choice 8 - Delivering new walking and cycling routes		
Choice	Policy change	% support overall
8a	Identifying new cycle routes	91% (741/69)
8b	New cycling routes – allocated	89% (727/87)
8c	New cycling routes – proposed sites, TA and Action Programme	86% (662/100)

There was very strong support for all the proposed changes. Objections included cycle paths on road (not segregated) is dangerous and causes congestion, that a small minority actually cycle, takes road space away from buses, and delivering new walking and cycle routes is much less important than improving existing ones: pavement improvements, widening, more road crossings, traffic calming.

The preferred options were taken forward in part:

- **Choice 8A, B, C** - This preferred option has not been taken forward, instead the existing policy that safeguards the cycle and footpath network has been revised to include a criteria that states development will not be supported that would prevent the implementation of proposed cycle paths/footpaths shown on the Proposals Map and Proposals section or other routes identified in the Council's Active Travel Action Plan, or other routes identified through Place Brief and Place Briefs following community consultation. It is the intention that this criterion supports the delivery of all identified routes in site briefs and through place briefs and place plans that come forward as City Plan sites progress.

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

This choice consulted on the designation of a 'short-term control area' for Edinburgh and whether City Plan should have a policy to determine applications for planning permission for short-term lets.

The preferred choice is to consult on designating Edinburgh or parts of Edinburgh as a ‘Short-Term Let Control Area’ where planning permission will always be required for a change of use of whole properties for short-term lets. Choices for City Plan also set out how we wanted to create a new policy on the loss of homes to alternative uses when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. The reasonable alternative is to continue to use existing policies.

- A. We want to consult on designating Edinburgh, or parts of Edinburgh, as a ‘Short-Term Let Control Area’ where planning permission will always be required for the change of use of whole properties for short-term lets.
- B. We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses.

Response

Choice 9 - Protecting against the loss of Edinburgh’s homes to other uses		
Choice	Policy change	% support overall
9a	Short term let control area	86% (692/107)
9b	Short term let – new policy	88% (703/95)

There was strong support for both. Objections to this policy included that STL should be controlled through licensing and enforcement.

- **Choice 9 a** - This policy was continued forward into the plan with a new policy. This new policy will be in addition to our current policies which prevent development which would have a detrimental effect on the living conditions of nearby residents. The new policy presumes against the loss of housing.
- **Choice 9b** - The Scottish Government has recognised that very high concentrations of whole property short-term lets can affect the availability of residential housing and the character of a neighbourhood and that some types of building are not well suited to this intensive use. Statutory instruments to allow the designation of ‘short term let control areas’ will come into force in spring 2021. The Council is currently consulting on the designation of a Short-Term Let Control Area.

Choice 10 - Creating sustainable communities.

This policy choice consulted upon changes to our student housing policy, a requirement to deliver housing on all sites coming forward over a certain size and the better use of standalone supermarket sites.

- A. We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student’s wellbeing. We will do this by requiring:
 - New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college.
 - To deliver market and affordable housing as part of the mix,

- To be built for, and managed by, one of Edinburgh’s universities or colleges and,
 - Deliver a maximum of 10% studio flats.
- B. We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. On sites over 0.25 hectares coming forward for student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. The new policy would not apply to land specifically allocated or designated within the plan for a specific use – i.e. business and industry land, safeguarded waste management sites, minerals sites, single school sites, our town and local centres, or sites covered by our office policy.
- C. We want to create a new policy promoting the better use of single-use out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported.
- D. We could continue to use our existing policy on student accommodation which sets out criteria on which purpose-built student housing will be allowed based on its location and concentration only. Other guidance is currently set out in our non-statutory guidance on student housing.
- E. We could continue to use our current policies which support housing as part of mixed-use development on appropriate sites to meet housing need and create strong, sustainable communities and seek to ensure a co-ordinated approach to development.

Response

Choice 10 - Creating sustainable communities		
Choice	Policy change	% support overall
10a	Student housing – changes to policy	84% (613/116)
10b	Requirement for housing on all sites over set size	78% (562/156)
10c	Better use of standalone supermarket sites	84% (570/108)

All three policy proposals received support. Objections to these policy changes included:

- 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,
- Student accommodation is more efficient use of land and frees up existing housing stock,
- 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.

If we want to increase the number of new homes, particularly affordable homes, being built in Edinburgh we need to make best use of the limited space in our city to ensure the creation of sustainable communities. Purpose-built student housing, retail, leisure, hotels and other commercial developments, are being built often at the expense of creating strong sustainable communities. We want sites coming forward for these uses to also deliver new housing.

The preferred options were taken forward:

- Choice 10A, B, C - The preferred option has been taken forward with the revision of the student accommodation policy. The revised policy directs student accommodation to locations where there is good access by public transport and active travel routes to further and higher education institutions. A policy framework now sets out a requirement for housing on all sites over a certain size,

Choice 11 – Delivering affordable homes

This consulted upon changes to our affordable housing policy, to increase the % required as part of new development from 25% to 35%, and the type of tenures required to be delivered.

- A. We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units.

This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable.

- B. We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector.
- The affordable housing should be tenure blind and should be a representative mix of the housing types and sizes which make up the total development
 - All private and/or rented residential accommodation of more than 12 units will be expected to make an onsite affordable housing contribution, and
 - Affordable housing units which will be owned or managed by a Registered Social Landlord through Affordable Housing Contracts must meet the RSL’s design guidance and Social Rented homes will be expected to meet Housing for Varying Needs standards.
- C. We could continue to use our current policy on affordable housing (Hou 6) which requires all housing sites to deliver 25% affordable housing and our non-statutory guidance and practise note.

Response

Choice 11 - Delivering more affordable homes		
Choice	Policy change	% support overall
11a	Increase affordable housing from 25% to 35%	71% (518/206)
11b	Mix of house types and tenures	78% (542/152)

There was support for both policy changes, but the level of objection to this, specifically from the development industry is highlighted.

We want to deliver our 20,000 affordable homes in the most efficient way, within mixed sustainable communities, whilst minimising green belt release. To do this it is time to change our affordable housing policy from 25% to 35%.

The preferred options were taken forward:

Choice 11A and B - The preferred choice has been taken forward with a policy requirement to provide 35 % of all units as affordable housing and policy requiring a mix of house types and sizes.

Choice 12 - Building our new homes and infrastructure.

This choice set out three options for where we could build our new homes, and a range of sites to deliver them. The three options were – a brownfield, council and partner led strategy, a greenfield, developer led strategy, and a blended approach.

The preferred choice is to have all new development delivered by the Council and its partners within the urban area, in order to minimise greenbelt release to reach the affordable housing target. There are two reasonable alternatives. One is a market led greenfield approach, where sufficient land is released from the Green Belt and supporting infrastructure is identified. The other reasonable alternative a blended approach where the Council intervenes to deliver more in the urban area and release some land from the green belt where supported by the ER with appropriate new infrastructure to support it.

Response

Choice 12 - Building our new homes and infrastructure		
Choice	Policy change	% support overall
12	Spatial strategy Brownfield Greenfield Blended Approach	76% 5% 19% (884/66/221)
	Sites supported (numbers) Calderwood Kirkliston West Edinburgh East of Riccarton South East Edinburgh	142 159 146 148 158
	Sites – objections (numbers) Calderwood Kirkliston West Edinburgh East of Riccarton South East Edinburgh	251 655 287 264 450

Most responses supported the Brownfield strategy, however it must be highlighted that landowners and developers supported the blended approach. In terms of the options for sites, these all received

both support and objections, with Kirkliston receiving the highest level of objection. Some brownfield site, including the Inch Park Depot also received a high level of objections.

- **Choice 12** - The preferred approach has been taken forward. Housing sites have been identified within the urban area with no green belt release. Development principles have been included for all sites and supporting assessments required are set out (Townscape Visual Impact Assessment, Heritage/Landscape Impact Assessment, Preliminary Ecological Assessment, Tree survey/constraint Plan, Flood risk assessment, Archaeological mitigation required, noise Impact Assessment, Air Quality Impact Assessment, Protected Species assessment.)

Choice 13 - Supporting inclusive growth, innovation, universities, & culture.

This choice consulted on a new policy to support inclusive growth in Edinburgh. The preferred choice is to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning and the low carbon sector where there is a contribution to good growth for Edinburgh. The reasonable alternative is to retain current policies.

- A. We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh.

This would include policy support for:

- Projects and actions arising from the transformation of the City Centre
- Edinburgh’s festivals and cultural offering across the city
- Development associated with our universities and colleges that relates to innovation and learning
- The Edinburgh BioQuarter
- West Edinburgh (see also Choice 14)

This policy will not be designed to provide support for standalone, purpose-built student accommodation, short term lets, hotels or leisure, offices or business and industrial land as these are covered under other Choices in this document and policies in the local development plan.

- B. We could continue to use our existing policies which support development in Special Economic Areas.

Response

Choice 13 – Supporting inclusive growth, innovation, universities, & culture		
Choice	Policy change	% support overall
13	New policy supporting good growth	82% (531/110)

The choice received a high level of support. Objections to this policy change included: Supporting increased tourism in a city suffering from over tourism is not helpful in creating a balanced or sustainable economy.

The City’s Economy Strategy supports new approaches to tackling the barriers that reinforce poverty and inequality and establishing Edinburgh as Scotland's leading city for fair work practices and

socially responsible business. We also want Edinburgh to be the data capital of Europe and to build on our existing success as the UK’s most entrepreneurial city.

Work on delivering these aims is already underway and the Edinburgh and South East Scotland City Region Deal, signed in August 2018, is a mechanism for accelerating sustainable economic and inclusive growth in the City Region through maximising these growth areas. £1.3 billion will be invested across Innovation, Skills, Transport, Culture and Housing themes over the next 15 years.

We recognise the contributions that our partners are making to the wellbeing of our city and our economy. We want City Plan 2030 policies to support the delivery of good growth for Edinburgh. The preferred choice was carried forward through the preparation of a new policy (Emp 1) which supports development that contributes towards these sectors.

Choice 14 – Delivering West Edinburgh.

This choice set out options for future growth in West Edinburgh, including the use of an ‘area of search’ to accommodate the findings of the current West Edinburgh study, and allocations for development at the safeguarded Royal Highland Showground site to the south of the A8 and the ‘cross-winds’ runway.

The preferred approach is to support best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth by identifying an area of search. In addition, it proposes to remove the LDP safeguard for the Royal Highland Centre at Norton Park and allocate the Edinburgh Airport “crosswinds runway” for development. The reasonable alternative is to retain current policies.

- A. We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites.
- B. We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses.
- C. We want City Plan 2030 to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange.
- D. We could retain existing policy which restricts uses to those associated with the airport and retain the existing LDP allocation for the Royal Highland Showground.

Response

Choice 14 – Delivering West Edinburgh		
Choice	Policy change	% support overall
14a	West Edinburgh (area of search)	76% (441/139)
14b	Remove safeguard at Royal Highland Showground	53% (293/250)
14c	Allocate crosswinds runway for development	55% (296/236)

The area of search approach was generally supported, but both options for development received mixed support, with most comments stating the development would be premature to the outcomes of the West Edinburgh study. In terms of the RHS site, until such time as the next National Planning Framework does or does not identify Norton Park as part of the strategic airport enhancements National Development with other associated uses, City Plan 2030 is required to accord with the requirements of NPF.

The preferred approach was carried forward through the allocation of sites in West Edinburgh for mixed use housing led development along the A8 and the preparation of site briefs/masterplans. The safeguard for the RHS is retained in the Plan.

Choice 15 Protecting and supporting our city centre, town centres and existing offices.

This choice looked at the role of our town and local centres. The preferred approach is to continue to protect and enhance the city centre, support and strengthen town and local centres and direct new development to them where justified by the Commercial Needs Study, support small scale proposals outwith local centres where is evidence of a lack of provision, review existing town/local centres including the identifying new centres and boundary changes, continuing to prepare supplementary guidance for centres.

In addition, support new hotel provision in local, town and commercial centres with good public transport access. This approach would have positive effects by encouraging active travel and discouraging private vehicle trips by ensuring development is in the most accessible locations.

The reasonable alternative is to stop using supplementary guidance and set out policy within the plan, and to seek to reduce quantity of retail floorspace within centres in favour of alternative uses and permit commercial centres to accommodate any growing demand. This approach is likely to result in additional private vehicle trips as commercial centres are generally less accessible by active travel and public transport and there is the potential for impacts on AQMAs.

- A. We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities.
- B. We will also support and strengthen our other town and local centres (including any new local centres) by ensuring that new shopping and leisure development is directed to them and only permitted where justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.
- C. We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.
- D. We also want to continue to prepare and update supplementary guidance tailored to the city centre and individual town centres. The use of supplementary guidance allows us to adapt to changing retail patterns and trends over the period of the plan. It also helps us ensure an

appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking.

- E. We also want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh in response to evidence of strong growing visitor demand and reflecting limited availability of sites in the city centre
- F. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.
- G. We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Response

Choice 15 - Protecting and supporting our city centre, town centres and existing offices		
Choice	Policy change	% support overall
15a	Continue town center first approach	86% (579/89)
15b	New shopping only in town centres or where gap is identified in walking distance	82% (536/113)
15c	Review town and local centres, including new centres	87% (535/77)
15d	Continue to use supplementary guidance for town centres	51% (287/235)
15e	New hotel provision in town centres	57% (364/269)

Most policy changes received support. Change that received less support were in terms of the use of supplementary guidance which divided opinion, and hotels in town centres, which received a reasonable level of objection.

Edinburgh's city centre and town centres are in a healthy condition with very low vacancy rates in comparison to many across Scotland. As Edinburgh's population grows there will be a growing demand for convenience and comparison-shopping provision.

Our [Commercial Needs Study](#) shows that with the growth of internet shopping, there is spare retail capacity within the city to accommodate most of this growth. It is only in the latter period of the plan that there may be a shortfall in comparison shopping provision. This will depend on how retail trends develop.

Any additional shopping provision, if required, must be met within the city centre or town centres, to maintain their role, function and healthy condition. Outwith town or local centres, additional small-scale convenience food shopping will be supported but only where there is a lack of provision within walking distance, to encourage active travel.

The preferred approach was carried forward through the retention of existing policies although various minor changes were made to make the policies more robust, following comments, and to provide additional clarity as to their purpose and function in the context of the new strategy set out in the Proposed Plan.

Choice 16 – Delivering office, business and industry floorspace.

This choice looked at the role of our business and industry floorspace. The preferred approach is to continue to support office use at strategic locations, to support office development at commercial centres, and to strengthen the requirement within the city centre to provide significant office floorspace within major mixed use developments.

In addition, identify sites within Edinburgh with potential for office development, introduce a loss of office policy, identify proposals for new modern business and industrial sites, ensure some business space is retained during redevelopment of existing sites, continue to protect industrial estates, and introduce a policy that provides criteria for locations where we would support goods distribution hubs. This approach is likely to have positive effects in terms of minimising the need to travel and improving air quality as long as new office development is located in the most accessible locations with access to public transport services and active travel.

The reasonable alternative is to retain current policies.

A. We want to:

- Continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres.
- Support office development at commercial centres as these also provide accessible locations.
- Strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments.
- Amend the boundary of the Leith strategic office location to remove areas with residential development consent.
- Continue to support office development in other accessible locations elsewhere in the urban area.

B. We want to identify sites and locations within Edinburgh with potential for office development.

C. We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market.

D. Or we could introduce a 'loss of office' policy only in the city centre.

Response

Choice 16 – Delivering office, business and industry floorspace		
Choice	Policy change	% support overall
16a	Reduce retail floorspace to accommodate more leisure and other uses	73% (422/150)
16b	Support strategic office locations	88% (450/59)
16c	Support office at commercial centres	89% (437/51)
16d	Support office in city centre as part of major mixed use developments	77% (373/108)
16e	Amend Leith Strategic Office Location to	64% (262/144)

	remove areas with residential consent	
16f	Support office in other sustainable locations	82% (394/84)
16g	Identify sites for office potential	77% (362/108)
16h	Introduce a loss of office policy	
	City-wide	42% (194)
	City -centre	24% (112)
	No change to policy	32% (147)

16.2a	Identify floorspace for business and industry at (numbers of support / object)	
	Leith Strategic Business Centre	84% (312 / 57)
	Newbridge	80% (285 / 67)
	Newcraighall Industrial Estate.	88% (307 / 40)
	The Crosswinds Runway	65% (225 / 121)
16.2b	New business space as part of place briefs	77% (342/100)
16.2c	Continue to protect existing industrial estates (under Emp8)	87% (371/55)
16.2d	Support for goods distribution hubs	91% (416/39)

Most choices received a good level of support, apart from the proposal to require office as part of mixed-use development and amendments to the Leith Strategic Office Location to remove areas with residential consent.

The preferred approach was carried forward continuing to support office development in preferred locations, however, the allocation of new office sites and a loss of office policy were not introduced reflecting, in part, the unknown consequences of Covid-19 on the office sector. The preferred approach of continuing to protect industrial estates and introducing policy for goods distribution hubs was also carried forward.

Summary

In all of the Choices options presented, whilst some of the support to opposition ratios narrowed from the greatest range with support by a factor of 10 to 1 in favour, only seven of the overall 61 proposal or policy sub-choices attracted less than 2 to 1 in favour and in no case did more of those who responded oppose a choice than support it.

Choices for City Plan 2030 Responses

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		
Agree 92%	Disagree 8%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<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. • Biodiversity is enhanced, especially through creating wildlife corridors • Enriches and build communities but it must reduce inequality. 	<ul style="list-style-type: none"> • Delivery of green network vague and lacking in detail • Not reasonable to expect development to deliver network in its entirety • 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. 	<ul style="list-style-type: none"> • Not enough information to agree or disagree. • SEPA 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 • 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. • The relevant landowners of new sections of the blue/green network should be consulted before designation

<ul style="list-style-type: none"> • Provides economic development openings. The network must be accessible from 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 • SEPA 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 they received as this may have no relation to mapped GI priorities. • 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, some of which could be adopted for public use • CEC 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. 	<ul style="list-style-type: none"> • The main issue is the network requires substantial investment and an element of compulsion. If this is not addressed by CEC the next LDP will just bring about disconnected bits of green space • 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 	<ul style="list-style-type: none"> • 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. • By gradually removing on-street parking we could also free up space in the heart of the city for this infrastructure. <p>there should be regard for other networks to be developed and co-exist. Properly designed and managed these may occupy the same spaces and routes. Heat networks 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.</p>
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<ul style="list-style-type: none">• Making optimum choices for the provision should be data-driven; using GIS mapping, census data and visualisation tools• This should include renewable energy and energy storage.• SESplan worked with SNH 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 CEC'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 CSGN, a national development in NPF3.		
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1B: We want to change our policy to require all development to include green and blue infrastructure

Agree 90%	Disagree 10%	Did not answer
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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 • Reduces noise pollution, in particular from traffic 	<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 Cityplan 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 problems for surrounding properties in places such as New Town 	<ul style="list-style-type: none"> • clear guidelines including examples are included 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 given the requirement at question 1H for green spaces to have management arrangements in place.

- Trees and plants absorb particulates and provide cleaner air
- Green and blue infrastructure also controls temperature (for example through tree shading) and 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.
- Helps in other extreme weather events like droughts and heatwaves
- 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 National and International stage as a tourist destination
- 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 5 minutes' walk away from their nearest usable green space

- 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.

- 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.

<ul style="list-style-type: none"> • 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. 		
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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		
Agree 96%	Disagree 4%	Not answered
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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 	<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. • 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

- 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 development might take place.
- 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.

Water (surface water management) and SEPA (flood risk attenuation) before inclusion in the emerging City Plan 2030.

- 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)

other strategies should be accompanied by a Shoreline Management Plan.

- 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.
- 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 infrastructure, the scale of provision required and what alternatives could be agreed where on site provision is constrained.
- Prior agreement with the landowner is required, and there may be compensation necessary.

- 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, and integration with public transport, walking and cycling.
- 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		
Agree 82%	Disagree 18%	Not answered
Reasons for agreeing	Reasons for disagreeing	‘Don’t know’/Other Issues
<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 c-19 pandemic. 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. 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, supported by the 	<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 site circumstances there is a justification for such development. 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 	<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? 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

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.

- 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 SIMD data shows pockets of deprivation). Furthermore that 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 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 including enhancing biodiversity and water management.
- This development is also beneficial to deliver needed housing and to meet challenging targets. It is stated there would be demand and uptake of many of these spaces from the development

replace Open Space 2021 has been consulted upon.

- 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.

existing communities to reducing polluting commuting

- "Improvements" to existing public parks should not include permanent residential or commercial buildings.
- 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 CEC, 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.

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?
- CEC 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.
- 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

Agree 83%	Disagree 17%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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 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 Provides economic development openings this large scale of public space is needed given the corresponding large scale of development being proposed for Edinburgh. Covid-19 has highlighted the need for these types of spaces too 	<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 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? Scottish Enterprise state 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 	<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 5ha spaces would go in the existing extent of the city so it should only apply o greenfield releases. 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

- 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 combined sewer, provide an alternative for surface water currently going into the surface sewer and help build the city's resilience to climate change.
- 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 be 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.
- Planning should also ensure existing dwellings have adequate space
- Support the policy but it should go further, and also recognise the importance of even larger greenspaces over 5 hectares. Why five? Why not four? Or six? or ten?
- Support policy however managing spaces is already a struggle and has a high cost to the Council so a review is needed about section 75 planning agreements. This should consider how long-term maintenance is done and funded

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 prospective residents -especially given additional proposals such as increasing on-site affordable housing requirements.

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.
- Public open space needs to be truly public not private and restricted in who can use it

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		
Agree 89%	Disagree 11%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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. • 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 as well as air and soil quality. • 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. • Growing spaces and producing a food growing strategy is a requirement for CEC as contained in the Community Empowerment (Scotland) Act 2015 	<ul style="list-style-type: none"> • The Council's aspiration to significantly increase the density of new development is perhaps 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 the allocation will fail the tests of effectiveness set out in SPP) 	<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 housing means fewer households have access to their own private garden. • The way growing spaces are used is important to. There are existing techniques already developed and where they can be adapted as

- 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 SPP 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
- 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.
- SEPA 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

- 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.

- 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.

them, maintenance of part of the green network and community involvement in it is built in

- There will be an important role for the proposed place briefs to identify these specific sites for new allotments and food growing.
- 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.

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

Agree 76%

Disagree 24%

Reasons for agreeing

Reasons for disagreeing

'Don't know'/Other Issues

- 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 impaction 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.
- There are concerns about how environmentally friendly crematoriums are
- 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.

- 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.

- 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 CEC to help identify suitable sites.
- Green and woodland burials should be affordable to more people.
- Perhaps other methods for disposal of the dead could also be considered as alternatives.
- New cemeteries should aim to more 'wild' as unkempt havens of nature where people can go and picnic and play amongst the stones
- This is a pre-existing problem and should be the responsibility of CEC. It should not be required as a developer contribution.

- 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.

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

Agree 87%	Disagree 13%	
Reasons for agreeing	Reasons for disagreeing	‘Don’t know’/Other Issues
<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. • Some representations argue that applications for development must be required to be supported by demonstration that such long-term management and maintenance is achievable. • Most, though not all, developers favour factoring arrangements as these provide proper management and maintenance in perpetuity. • Factoring means the residents of homes, whom directly benefit from such provision, carry an equitable financial burden and interest in maintenance. 	<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. These should be adopted and maintained and managed in a similar manner and paid for through Council Tax. • 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"> • 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. These should be adopted and maintained and managed in a similar manner and paid for through Council Tax. • Some representors argue that responsibility for spaces, including some budgetary responsibility, should be given to local, public groups.

- 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.
- Representors are cynical that this will always be the case given factoring inherently focusing on profit and not residents.
- Consequently many representations, and a smaller proportion of developers, argue the Council should adopt all new green and blue spaces.
- 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.
- Many representors highlight the resource implications for the Council in adopting spaces, although they note developers should provide the Council with a commuted sum to take adopt and maintain spaces. It has been noted if this proposal involves contributions from new residents and businesses who may occupy areas involved with long-term maintenance

- Maintenance should be dealt with on a case by case basis given varying circumstances.

- 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
- 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.

arrangements then this must be very transparent.

- It is critical to make an assessment of long-term implications for maintenance and management, before applying any planning conditions for green space in new developments.
- A diversity of uses, including growing spaces, can be a successful approach, particularly in denser areas with fewer private gardens.
- 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 SUDS)

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

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.		
Agree 90%	Disagree 10%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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. • 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 	<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 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. • Planning policy which conflicts or goes beyond other statutory requirements causes confusion and delay and adds unnecessarily to costs. It is 	<ul style="list-style-type: none"> • There is not enough information given to agree or disagree • 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 the 'climate change plan'. • Modify this 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. • 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

- 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 storage for shared bikes and normal bikes in close proximity to or within housing.
- 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.

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.
- This policy should go further in requiring totally car free developments, with it noted this emphasis applies to each of the other applicable options set out in Choices also.

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 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.
- 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..

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.

Agree 64%	Disagree 36%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<ul style="list-style-type: none"> 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. 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. 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 	<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 requirements 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 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. 	<ul style="list-style-type: none"> CEC's view is that 80% of units would be houses at a density of 65 dph 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 needf 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 contributions based on a higher proportion of houses. A 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

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 of 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, we suggest that policy should be more dynamic. Rather than one or two absolute minimum thresholds, could density requirements vary and be identified for different areas and linked to current and planned PTAL ratings for example?
- A further suggestion is the 65 dph proposed standard could be applied to urban brownfield sites (although some argue the 100 dph is appropriate for brownfield and others go further advising even 100dph is too low simply mirroring the ten-year average in the city).
- By comparison a lesser density range from 50-65 units per Ha 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 dph based on UK average

- 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.
- Education provision is at breaking point in some areas of the City. No consideration appears to have been given to this when allocating higher concentrations of dwellings in particular catchments.
- 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 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 dph 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?
- Households will not be 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

site's specific circumstances and accounting for infrastructure.

- 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.
- 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

household size of 2.2 persons, albeit there is some flexibility. Other suggestions states densities should start at 30dph or 40dph 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 landscape impact of new settlement edges for example.
- 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

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.

- 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.
- 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

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.
- 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

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 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.

- 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.

site and its surrounding area. Delivery will be harmed by this policy change, which should be a focus of LDPs as per SPP.

- Density and services provision are also a financial consideration that will vary between sites. Whilst an increase in density may increase sales revenue and community services provision, land value revenue accounting works when land can be developed allowing site values which can be 'shared' through community deductions.
- 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.
- 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

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.

- 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 dph 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.?

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

Agree 85%	Disagree 15%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<ul style="list-style-type: none"> • This is important for well-being leading to higher levels of physical activity and improvements in physical and mental health. It accords with the six qualities of a successful place and Place Principle and the terms of Edinburgh's Design Guidance. It makes our cities more liveable, affordable and reduces social isolation. • This benefits air quality and supports the transition to a net zero city by 2030. It also complements the vision of the City Mobility Plan • Ideally, provision would be within a green / blue edged corridor providing an urban habitat network that links to open / greenspaces as well as other destinations of work, shopping, home, leisure, countryside, neighbouring authorities etc. The expansion, improvement or re-instatement of routes in combination with river restoration measures is a major component of current SEPA Water Environment Fund. • Development layouts must also ensure that sustainable transport options are available and accessible to people of all needs and abilities. This is to ensure that the sustainable transport network is equitable and designed to support use by people who use wheelchairs, electric mobility aids as well as people who have prams, all sorts of bikes, etc. Electric charging points must also be made available for all electric vehicle types, including mobility vehicles. 	<ul style="list-style-type: none"> • It is not clear why this cannot be done through a combination of existing policies and new place briefs /masterplans • It is excessive to require every development to do this, particularly when we have no idea what the economy is going to look like in 3 months • Some cycle routes can undermine the safety of all road users and there may be reduction in road functionality and resilience from a net loss in practically useable transport capacity. • Perhaps this should go hand and hand with routes where cycling is banned to allow a better flow of essential motorised/public transport in transport corridors. • Concerns that the Council's assessments of individual sites in the Housing Study in respect to accessibility to active travel are not reasonable – being overly demanding on what constitutes good accessibility. The Council needs to be bolder in encouraging active travel. For example, the Union Canal is dismissed as being over-capacity for cycle use and other existing routes appear to be dismissed without analysis of potential solutions. • The adopted LDP Part 2 Section 2 Design Principles for New Development and the Edinburgh Design Guidance (November 2018) already provides a policy framework in accord 	<ul style="list-style-type: none"> • Any new provision for active travel must not expect developers to build on land outwith the control of the applicant. • Any off-site contributions must be proportionate, fairly and reasonably related to what is proposed and must be necessary. • It is not explained in detail what is being proposed. • There must be local consultation prior to specific changes, with both communities as well as travel focused groups amongst others. • The City Council must be prepared to use Compulsory Purchase powers itself, where aspirations for connectivity cannot be delivered • Given the issues above then delivery of associated infrastructure will therefore be phased to ensure a coherent network and avoid stalling certain developments. • Suggest amending wording to encourage people to 'walk, cycle and wheel' (mobility scooters, kick scooters, adapted wheelchairs and so on).

- Connected networks that are legible and safe to use, based on a hierarchy of off-road, segregated or shared infrastructure. This should create direct links that do not require people using them to travel out of their way in order to join the wider network. This is especially important for disabled individuals and many age brackets, including families and the elderly. A good, wide standard of path is needed along with places to sit and rest and meet increasing demand. Any cycle/pedestrian routes should be designed to Secure by Design Standards
- Routes should be adopted and supported by adequate revenue budgets to ensure that they are well lit and maintained. Cycle and pedestrian routes require constant management to ensure that they are still fit for purpose, not obstructed by parked vehicles, wheelie bins, utility company infrastructure, street signage etc. and that any pot holes, damaged slabs or broken glass are dealt with.
- In new housing developments, there should be a requirement to provide a number of cycle parking bays on the street to cater for short-term visitors.
- This change will create more attractive places and in turn encourage greater active travel. More natural/informal design layouts and street patterns should be used. This should then be incorporated in revised Street Guidance.
- Sites should not be developed which continue to rely on the use of cars to connect to schools, shops and community facilities.

with the Edinburgh Council Street Design Guidance and the six qualities of successful places in SPP (as well as Designing Streets and Creating Places). City Plan 2030 should therefore continue to adopt the existing framework which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should align with any updated national policy in due course as SPP and Designing Streets already require this.

- Certain representations more specifically note existing policies are probably sufficient relative to smaller sites and that more strategic sites are likely to be the subject of development briefs or masterplans which are prepared in association with the site owner or developer.
- These measures however implemented should only apply to applications submitted following adoption of the LDP and not before, or retrospectively to currently pending applications under determination.
- Not sure if this is fully achievable in a city like Edinburgh. It must also not be used to force people to give up cars as it may be public transport links are poor and at capacity.
- There may also be less mobile people or those who need vehicles for their jobs.

- Some note that walkability being the prime concern. The pedestrian environment is one that we all use, even if we are wheelchair users, to get beyond our home into the wider environment. repair and maintenance of existing pavements and cycle lanes should be given priority
- The impact of the covid-19 crisis on travel and commuting behaviour remains to be seen and the city (and government) may need to take action to highlight the benefits of public transport.
- we would hope to see the development of a city-wide active travel plan that combines segregated paths along the main arterial routes, with clearly differentiated local access roads forming low traffic neighbourhoods between. There will also need to be requirements for secure cycle storage as part of new housing (and also offices)
- There should be provision for shared transport (share bikes and car clubs) at appropriate nodes around or on the edge of new developments can provide a catalyst for the design to achieve the active travel and connectivity targets.

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		
Agree 87%	Disagree 13%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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 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 	<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 SPP. 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 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. 	<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 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

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 PBSA 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 HMO's.

- 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 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.
- 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.

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 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.

Choice 3 – Delivering carbon neutral buildings

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

Platinum 68%	Gold 18%	Silver 67%	Bronze 12%	
Reasons for agreeing with Platinum	Reasons for disagreeing with Platinum			‘Don’t know’/Other Issues
<ul style="list-style-type: none"> • Energy use in buildings in Edinburgh accounts for a significant proportion of all citywide carbon emissions and energy use. 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. • 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. • CEC 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 	<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 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. • 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. 			<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 efficiency of the existing housing stock, which has a far greater impact on emissions. • 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?

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 question, for example to avoid increases risks of cold bridging and interstitial condensation.
- 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.

- 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 location and other merits (e.g. contributing to the Council's preferred strategy)
- 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 planning system is already not functioning efficiently due to a variety of pressures it has.
- Current Building Standards (such as Platinum, Gold and Silver) may become out of date as building standards are reviewed. Particularly so as any

- 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 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.
- 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 situation 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.

- The new policy should allow flexibility for future changes to standards which may increase in future.
- 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

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. 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.
- 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.

- Our understanding of much to do with climate change and different materials is changing so the highest possible standard now may not be as we come to understand the drawbacks of particular materials.
- 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 EDG.
- Request that some discretion is applied for water butts for all dwelling with private 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.
- How would new standards be applies, monitored and enforced?

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		
Agree 93%	Disagree 7%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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 to local food, education and healthcare infrastructure. This is important for rounded communities with identity and social cohesion which contribute to 	<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 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. 	<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 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

physical and mental health and provide high quality spaces for work, life and play.

- 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.
- Service Providers such as SGN 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.

- 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.

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 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.
- Concern that local communities can make choices which need to be considered within the city as a whole. Communities can focus on local issues and often only when an imminent development is proposed.

- 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.

- 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 CEC 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.
- A formal structure should be established setting how communities shall be involved in 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.
- 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 Joint Board for Health and Social Care as a whole systems approach.
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4B. We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions		
Agree 94%	Disagree 6%	
Reasons for agreeing	Reasons for disagreeing	'Don't know'/Other Issues
<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 • The new Planning Act enables LPPs to be proposed by local communities and so proactive engagement by the planning service is essential. • Place briefs appear to be a good concept for delivering LPPs • LPP's must be positively prepared, supporting growth to meet the identified need, and prepared within the current planning policy framework. • Various key agencies (e.g. HES) have expressed support and willingness to engage with the LPP process and provide information to assist. • The Place Standard tool is recommended for LPPs 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. 	<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 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. • 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. 	<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 LPP 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. • 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. • 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. • 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 | <ul style="list-style-type: none"> • 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? | <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, not prevent development. Others note however this emphasises the importance of having an LPD that reflects the views and aspirations of the Edinburgh's communities in its high-level aims. • 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, |
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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 out through the Local Outcome Improvement Plan ?
- The successor to City plan 2030 should cover how LPPs that have been taken into account in planning decisions.

Choices for City Plan 2030 Responses

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

Aim – to realise the lifelong health benefits of walking and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable transport.

Choice 5 – Delivering Community Infrastructure.

5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements		
Agree 92%	Disagree 8%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> Proactive forward planning is needed to ensure capacity is managed. Provide an explicit 'infrastructure first' policy. Recognises the strain of new development on existing services. Given that resources are constrained, and likely to be so in the future also, it's important to concentrate them as effectively as possible. Logical approach and one which is supported by SPP and the current LDP. Positive outcome to deliver within communities, helps social cohesion and empowerment especially if integrating choices 1, 6, 7 and 8. Strong support for new non-denominational Primary Schools and a new Secondary school in North Edinburgh – Leith specifically. Supports and encourages the approach to align spatial planning with future community health and social care needs. Support sites that demonstrate early delivery of infrastructure. High density, mixed use development reduces the need to travel and is infrastructure 	<ul style="list-style-type: none"> Needs of the motorist must to be considered and that road infrastructure improvements will be required and must be implemented before development starts in many rural areas. No reference to healthcare or assisted living of the elderly as a key infrastructure with shortage of provision Not deliverable because it will not provide a range and choice of housing types and tenures across the City The planning of future health care services is a matter the NHS Lothians to address and not developers. Subsequently, contributions should not be sought. 	<ul style="list-style-type: none"> Sites with planning permission in principle should not have new requirements retrofitted at detailed or reserved matters application stage. Too great a burden on developers affects viability and may result in sites withdrawn from the market. <p><u>Transport Corridors:</u></p> <ul style="list-style-type: none"> Concern over ESSTS corridors deliverability due to changing economic circumstances. Focus on more relevant walking primarily, then cycling routes. All four corridors identified in ESSTS should be identified and planned for in City Plan 2030, and development on these corridors should be supported. Fundamental arterial route into Edinburgh (A90 from Fife) has been ignored in in the ESSTS. ESSTS doesn't adequately consider existing rail capacity, e.g. Curriehill services. Corridor 8 misalignment between mapping in Map 3 in Choices and Figure 9.1 in the

efficient, especially if supported by increased public infrastructure provision. Relate density levels to high public transport accessibility. Mass rapid transit reliant on move away from low density suburban housing model.

- More residents' homes in city centre reduces pressure on transport infrastructure from commuting patterns.

Public transport works best when development is concentrated at nodes.

study, affecting the housing study assessment/SEA.

- ESSTS lacks sustainable orbital movement options, linking park and ride sites and key employability sites across an east-west arc.
- Concern over the timescales to deliver and fund tramline 3 and risk that development precedes transport solutions.

Education:

- Publish education infrastructure appraisal in advance of the Proposed Plan.
- Prioritise sites within the Council's ownership. Don't adopt a standard land transfer cost or expectation, as the current Local Development Plan does, because every site is different.
- Welcomes the proposed provision of new education infrastructure in Kirkliston.
- Recognise that social housing is likely to house considerably more adults and children than an area with an equivalent density elsewhere. Therefore, base any density standards on the number of bedspaces per hectare rather than dwellings to take into account full occupancy of social housing.
- Justify education contributions and pupil product: high-density developments at over 65 units per hectare is unlikely to be deliver family housing; likewise where age profile of the development doesn't merit.
- Significant uncertainty as to the ability to deliver new high schools in the plan period, despite Housing Study concluding some

sites as being 'potentially suitable for development'.

- New schools should not be built on greenspace, instead should provide new greenspace and growing/planting space.
- Urban school sites may have restricted outdoor space whereas greenfield sites can deliver community based facilities for greater community use.
- Active travel planning for access to schools is fundamental from outset.

5B We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services.

Agree 95%	Disagree 5%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Primary healthcare needs to be accessible for public and staff, and for health and wellbeing, active travel and public transport routes are key. • Safe active travel as a default option when accessing community infrastructure and use national user hierarchy for streets. • To minimise carbon emissions and create a healthier and pleasant living environment. • Important that investors and developers are as certain as possible about the requirements that will be required for new developments. 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •

5C We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel.

Agree 93%	Disagree 7%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Supports a high walk-in population and reduced need to travel, and the less need for car ownership. • Aids successful placemaking. • Co-locating community services in some of the new allocations as part of a strategic network of agreed healthcare and other community infrastructure should then be identified in development briefs in City Plan 2030. • This supports the development of a greater number of hubs to deliver social care locally. • People want affordable facilities, open at useful time, within their own communities. • Will support carbon emission strategies and contribute towards effectively building sense of community in new developments. 	<ul style="list-style-type: none"> • The volume of travel to these facilities doesn't justify much expansion. There are already many local offices delivering these services in Edinburgh. Also many of these services could be done online now which requires no travel. 	<ul style="list-style-type: none"> • Choice of active travel can be more inclusive. Provision of share bikes and e-bike share could help those that cannot walk quite so far. • Like to see the City Plan committed to the idea of a '20 minute neighbourhood'. • Community services should ideally be within active travel distance of all residents and services hub should be at the heart of each community. • People want to get to services quickly. • Provide on-street logistics hubs (with lockers) to reduce traffic from delivery vans and to support shop deliveries. • It's important that we avoid the need to always travel into city centre for services that could be delivered locally. • Make it easier for low-paid workers to live near their city-centre workplaces. • Primary Care services should be at the heart of communities they serve- both in terms of accessibility for the public to services and for the delivery of services by teams who require to do home visits e.g GPs, District Nurses, thereby reducing travelling times. • To deliver services locally, hubs for social care staff to interact with communities, currently these are larger hubs that serve wide areas where transport is essential to

meet people's needs. So redesigning how social care work across the city will be crucial to delivering local services.

- More imagination about how buildings and facilities are used.
- Centralised services has been a disaster for healthcare with long journeys to Western or ERI, same with decentralised to out of town retail.
- People working in the services may still need to commute.
- It should be recognised in policy that there will be opportunities for smaller scale development to be located in less accessible areas.
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5D1: We want to set out where development will be expected to contribute toward new or expanded community infrastructure.		
Agree 95%	Disagree 5%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Welcome clarity at the plan stage on what infrastructure will be expected to be provided. • Clear and transparent contribution expectations are important for developer and investor confidence and infrastructure requirements should be identified in the LDP and clearly justified. • We support this provided it is clear what the benefit is to that development. • Recognising and addressing the impact of the additional growth on primary care infrastructure through contributions will enable appropriate and timeous delivery response. • A full deliverability and viability assessment should be undertaken to determine whether or not the developer contribution contained within the whole plan are affordable within individual market areas within the city. This will prevent such contributions from precluding much needed development from coming forward and delivering the aims and objectives of the plan. • To be viable, City Plan 2030 should allocate development sites that are strategic in scale and offer the potential for community infrastructure to be required and well utilised. • The level of developer contributions should be raised considerably. We are emphatically clear that developers of student accommodation must be required to contribute equally, alongside developers of all other types of housing etc. 	<ul style="list-style-type: none"> • Do not agree with contributions being required towards healthcare facilities that are run as private practices. • Concern over the Education Appraisal accompanying Choices in its density assumptions and consequent overestimation of pupil rate, with infrastructure requirements significantly overstated. • Fundamental that new programmed allocations identify what infrastructure is required, when and where, in consultation with Homes for Scotland and its membership. • 	<ul style="list-style-type: none"> • Consider impacts that new development may have on the existing rail network. Large residential developments that rely upon current rail capacity can both individually and cumulatively impact on the strategic function/capacity of the network. Impact on the network must be assessed as many routes and stations are operating at capacity. Commensurate increases in services or capacity may be required to avoid congestion. • Set out how much delivery will be funded by public funds (understand financing, and financial gap). • Developers can benefit significantly from the enhanced development value of green field sites and, in these circumstances, should be prepared to make appropriate contributions towards the costs of infrastructure. • Infrastructure contributions from developments on brownfield sites need to be carefully assessed so as not to discourage the reuse of such sites by developers. • Community input and engagement is key and critical to success. • Deal with on a case by case basis commensurate with the location and scale of any particular development. •

- Developers must be part of the solution to delivering on community aspirations.

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5D2: We want to use cumulative contribution zones to determine the infrastructure actions, costs and delivery mechanisms		
Agree 79%	Disagree 21%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • 'Cumulative contribution zones' recognizes that developing the city and meeting the challenges faced by this plan is a combined and shared endeavour. • By taking a cumulative approach over an entire zone, the opportunity to avoid delivering infrastructure because the site is too small to deliver, is reduced. • Sharing of infrastructure costs may unlock development in areas where initial infrastructure investment is too great a burden for one developer. • Where the total cost of delivering necessary infrastructure improvements in a wider area would fall disproportionately on one development then sharing these costs proportionally and fairly between all developments which fall within that area seems appropriate. • Enables a more strategic approach to the location of mobility hubs across a zone. • This will enable optimisation of community infrastructure and ensure consistency. 	<ul style="list-style-type: none"> • Contribution should be applicable only in the area under development. • Notes complication in the process if developments happen at different times and infrastructure will be held back. There is no doubt that substantial public investment will be needed in infrastructure improvements and expansion and there is a limit to what new development can support without adversely affecting that market and its price structure. • Do not support use of cumulative contribution zones, and in order to establish that contributions relate to proposed development or as a direct consequence, a robust evidence base is required to demonstrate this relationship. • For reasons outlined in the Ministers direction Jan 2020. • Agree in principle the cost of infrastructure should be shared equitably but not all development sites are equal, site specific costs depend on a range of factors and land value. Higher abnormal costs, lower returns. What if the council actively flexed contributions to strategically stimulate housing delivery, effectively cross-subsidising more complex sites from elsewhere across the city? • Complications might arise with the implementation of this proposal, if there is disparity between the viability of the various developers involved in a particular zone. 	<ul style="list-style-type: none"> • Partnerships, using a mixed of funding streams, working together to enhance existing or create new water environments and habitat networks will be a key element for success. • The principle of cumulation should be applied at the proposal and application stage with regard to developments over 0.25 hectares. • Negates argument of financial viability if costs are shared proportionately. • Onus then on Council to manage contributions and deliver. • Scottish Water has a separate funding mechanism to deliver network and strategic infrastructure. • Full deliverability and viability assessment should be undertaken to determine if contributions are affordable both within the whole plan area and within individual market areas. • Appears like the integrated approach but needs clarity on methodology on how cost is shared equally and what happens when there is a time lag between developments in a zone. • Network Rail would welcome a rail improvement zone approach (see East Lothian) along with Scotrail, are keen to be involved in identifying the infrastructure requirements, costs and delivery

- This has no basis in current planning law and practise and there are a number of legal cases that reaffirm this point.
- Recent appeal decisions show that there is a weakness in the current “contribution zone” strategy and without changes in legislation the cumulative approach to contributions will continue to be challengeable.
- Council is therefore needed to demonstrate that its approach to contributions meets the various tests in the Scottish Government Circular including that contributions need to relate to the proposed development and be proportionate.

mechanisms as a result of new development.

- An appraisal should occur of the approaches to planning obligations across the constituent SESplan authorities. Planning obligations should also be set in context of proportionality and affordability to ensure development viability.
- Potential to test the infrastructure levy approach including cumulative contribution zones, using existing regional partnership forums. Scope zones with SEStran/infrastructure providers so zones and costs are not established in isolation.
- Delivery must be communicated to communities, and don’t miss the more immediate off-site requirements for larger cumulative actions.
- Affordable housing developments led by housing associations (as opposed to S.75 affordable housing) should be exempt from contributions as in effect they are already providing 100% community infrastructure in the form of affordable housing.
- Clarification and simplification is needed on the basis for developer contributions with much better enforcement of agreements.
- A transparent pathway of where money is spent, with it being returned to the payee if initiatives are not delivered within a set timescale (3-5 year limit).
- The Council’s current cumulative methodology has been recently rejected by the Scottish Government. Further work by the Council is therefore needed to

demonstrate that its approach to contributions meets the various tests in the Government Circular, and going forward cumulative contribution zones should be influenced by the Chief Planner's letter.

- Clarify how do non-allocated sites with planning permission proportionately pay and if refunds will be made if more development in a contribution zone comes forward.
- Clarify it is the equal share of costs is between different developers picking up the whole cost, and not an equal split between the developer and the council.
- Cumulative approach spreads the costs of mitigating the cumulative impacts across a wide area with no single development being responsible for the entire cost of a specific infrastructure improvement. This is in effect, a 'roof tax', and there will inevitably be some winners and losers in this approach.
- The identification of infrastructure provides certainty, but the use of contribution zones is problematic, and cumulative zones are not supported.
- Await details of a proposed infrastructure levy and therefore the idea of cumulative contribution zones that may seek a second 'tax' for potentially the same purpose threatens to make development unattractive and potentially unviable in Edinburgh

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| | | <ul style="list-style-type: none">• Provided also the mechanism does not delay all contributing projects to the date that the last contribution is made. |
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5E We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance.

Agree 86%	Disagree 14%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Developer contributions can have significant implications for the viability and delivery of housing and should be within the LDP and not within Action Programmes or non-statutory guidance. This approach allows for consultation and independent scrutiny, which must be the case for such important matters. • In line with the new Planning Act. • Support a clear, integrated approach. More efficient and cost effective when it provides higher developer/investor certainty and confidence and hopefully reduce the s.75 negotiation timescale. • To emphasise the importance of the policy and ensure compliance. • One easy-to-read document, for the benefit of communities and developers alike. Developer contribution expectations must be transparent, understood by communities, in the LDP, with site specific details. • Better for developers to deliver directly. 	<ul style="list-style-type: none"> • We need the confidence that this has been independently considered prior to adoption, and only applied following adoption. It will not be possible to set out the precise amounts until the content of the plan is approved (otherwise, updates to the Contributions will be required prior to adopting the Plan to reflect changed allocations which could have a bearing on the amounts identified in the plan). Therefore, the precise contributions should continue to be set out in Statutory Supplementary Guidance prepared following receipt of the Examination Reporters Report. • It is not in the interests of a plan led system to defer the inclusion of important policies which will impact on viability to non statutory guidance with no formal process for adoption. • Only set out guidance for developer contributions within the City Plan 2030 and the associated Action Programme. Guidance for developer contributions should certainly not be set out in non-statutory guidance. • Potential issue with Action Programme also setting out costs and duplication/contradiction between the two documents. • We do not believe that the Action Programme should contain anything other than the Actions required to deliver the plan, and the contributions should be contained in one document. 	<ul style="list-style-type: none"> • Infrastructure charging mechanisms also need to be agreed to reflect the scale of community infrastructure sought. • The proposed contribution zones and levels should be subject to consultation with the development industry and the methodology should be clear. • Engagement with relevant stakeholders, including landowners should take place as part of the Action Programme's preparation and subsequent revision. • Developer contributions should be set out in site briefs. • Supplementary guidance could still be useful if circumstances change during a plan period and existing guidance requires significant amendment. The cumulative impact of policies in the plan on viability should be assessed and policies should clearly outline where further guidance will be required and the scope of this guidance. • Suggestion that there will continue to be a reliance on the Action Programme and non-statutory guidance appears to contradict contribution guidance in the plan. • Resolve existing Supplementary Guidance with the Scottish Government first. • Provided the existing 2018 Supplementary Guidance on Heat Opportunities Mapping is

- Developer contribution amounts should be fixed at the level they are at when a planning application has been submitted, and not amended upwards thereafter.

retained which is helpful and identifies opportunity to source significant scale heat for heat networks at Seafeld (existing RS-3 allocation of EW 1d for an Energy Recovery Facility). Moving this into the plan would be beneficial. It should not be done in a way that reduces its significance as a planning consideration in determining applications.

5B We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services.

Agree 90%	Disagree 10%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Primary healthcare needs to be accessible for public and staff, and for health and wellbeing, active travel and public transport routes are key. • Safe active travel as a default option when accessing community infrastructure and use national user hierarchy for streets. • To minimise carbon emissions and create a healthier and pleasant living environment. • Important that investors and developers are as certain as possible about the requirements that will be required for new developments. 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • •

Choice 6 – Creating places that focus on people, not cars – done up to here

6A We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes.

Agree 82%	Disagree 8%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Is in line with National Transport Strategy hierarchy with walking as primary mode undertaken and planned for. • Promotes the use of walking and cycling, least carbon intensive transport and contributes towards community health and fitness. • Tackles congestion. • 	<ul style="list-style-type: none"> • Not enough information on what targets will be derived from, justified and monitored. • Unclear how targets will be able to respond to changes in public transport timetables occurring during plan period. Resulting in undue prejudice by decisions outwith the control of the community/developer. • Use PAN 75 Planning for Transport Annex B Personal Accessibility Analysis for accessibility profiles for new development. • Development should not be hindered solely on accessibility grounds. • Would only work if public transport improvements are not just planned but already exist or are underway. • Won't deliver the certainty required for a planning system – relies on too broad a range of assumptions. New developments can subsidise early public transport services, which this approach won't take into account. • Policy would need to be flexible and allow for cross boundary commuting, or it discriminate those needing to travel further for work. • Need full understanding of existing mode share and communities' travel patterns. 	<ul style="list-style-type: none"> • Measure public transport usage of an area and target a percentage increase over plan lifetime. • Don't hold all applications to a single standard. Use a tiered approach to setting targets - city-wide, district and local) for specific types of development. • Could be assessed against ease of access to infrastructure and active travel networks. • Make it clear requirements not targets. • All new developments should have no net car traffic impact; consider zero onsite parking (and CPZ in the whole area) and/or car traffic reducing and public transport measures. • Not just private car use but other commercial vehicles that is causes congestion and air pollution. • LEZ central zone should be extended. • Take into account bus service frequency, directness and reliability. • Take account of residents and visitors with limited mobility, focus on accessibility for all. • If development is directed to where there is where there is sustainable travel options (Choice 5A), this proposed target should already be met. Seeks clarification at what

		<p>stage in the planning process would these targets are relevant.</p> <ul style="list-style-type: none">• Confirm how targets be monitored and success measured and what happens if targets are not met.• Policies should put in place interventions required to deliver modal shift.• Follow the Sustainable Transport Hierarchy and Sustainable Investment Hierarchy as set out in the National Transport Strategy 2 especially when designing layout of new development. Further consultation on the detail is required prior to Proposed Plan publication.• Would require deregulation of bus services allowing a commitment to deliver services from operators.• Consider factors impacting on bus use eg Covid-19 and rerouting of services from the CMP/CCT plans to reduce city centre through routes.• More consideration of creating new routes not just assessment of what exists.• Can't force residents to use one mode.• Majority of households will still want to own a car for some trips.• More important to build at higher densities so there is less need to travel long distances.• Approach may disadvantage areas already deficient in sustainable transport routes.• Update existing policy.• Council policies are too biased towards cyclists.
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		<ul style="list-style-type: none">• Plan for car routes to reduce time and emissions.
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6B We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport.

Agree 73%	Disagree 27%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> Place briefs should include information on trips by walking, cycling and public transport as a key element of successful places. If existing parking spaces are being reviewed, alternative uses for this space including mobility hubs, bike parking and retrofitting green / blue infrastructure should be considered as part of place-making and improving sense of place. Consider grouping parking spaces away from individual front doors, enabling a better use of outdoor space. Only increase parking restrictions when public and active travel have been improved. It is part of a suite of measures necessary to create the necessary shift from the use of the private car to the use of public transport as first choice for mobility into, out of and through the city. Will give local communities and opportunity to have their voices heard. 	<ul style="list-style-type: none"> No robust data to support or implement this. Methodology and targets needs to be consulted on and agreed to have sufficient weight and status. Can't support without knowing what the public transport would be. SPP and other guidance already sets spatial targets for active travel, and parking standards are already in place. Planning Advice Note 75 Planning for Transport Annex B Personal Accessibility Analysis provides the basis for identifying accessibility profiles for new development. Use existing policy framework. Wrong time to be making decisions and setting targets, pandemic will change work and travel patterns, office downsizing, reduced use of public transport. Not the function of place briefs and too prescriptive. Should be in policy or statutory supplementary guidance; too for briefs, may not be deliverable outcomes without the engagement of landowners and informed by costly detailed site works. Limited status of Place Briefs. Car may be only option for disabled residents. Multiple trips rely on private cars e.g. working parents, tradespeople, shift workers Desire to retain car ownership for trips away from main centres of population. 	<ul style="list-style-type: none"> If Place Briefs embed parking standards, they need to be available from the Plan's adoption, otherwise delays to housing delivery targets. Targets should be in the plan, but place briefs can use them. No reduction in bus stops/spacing. As other parking is reduced, increase disabled parking and drop off points. It is important also not to create another layer of hypothetical assessment that has to be undertaken, disputed and debated with every single planning application, to the benefit of nobody except planning consultants. Rescind its Parking Action Plan Explore car free streets. Plant trees and cycle parking instead of car parking. targets should only be set in relation to planned transit interventions where a financial and legal commitment is in place to deliver them Place brief should demonstrate that the need to travel generally is reduced. Master planning exercise to develop connectivity Use pilot demonstrators to raise awareness of designing in low car use. How will targets be monitored?

	<ul style="list-style-type: none">• EV means car ownership may remain prevalent. Reduce car use to work or city centre but not ability to park at home.• Low levels of parking are a source of objection to planning applications.• Low parking levels may result in less marketable housing, or overspill parking causing conflict with users, and reduced amenity.• If planned public transport intervention does not materialise, some developments will be left without enough parking yet rely on car use.• Employment hubs are dispersed around the fringes of the city, people don't always live near work and public transport won't always link.• Only for strategic development sites.• Zero parking is a challenge to provide for varying needs.• Many variables which need to be considered when establishing appropriate parking levels, some of which will not be known at the Place Brief stage e.g. operational requirements. It is therefore not appropriate to set such targets at this stage.	<ul style="list-style-type: none">• Avoid reverse incentive whereby people take cars to work to avoid daytime parking restrictions at their homes.••
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7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking

Agree 69%	Disagree 31%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Consistent with other cities seeking to prioritise walkable urban environments. • Has to be in conjunction with transport interventions. • Transport interventions must be integrated with masterplanning new development • Less pollution will encourage pedestrians and cyclists. • Integrated approach between modes of transport. • 	<ul style="list-style-type: none"> • Concern over methodology in determining suitable levels and how assessment of acceptability against targets will be made. • Results in parking in surrounding streets. Increase density/height rather than reduce parking. • Misuses planning policy to restrict car ownership. The rights of citizens to use cars (hopefully EVs) should be respected. • Dependent on new and improved public and active travel infrastructure. No guarantee public transport service can or will be provided in some areas. Needs to be backed up by commitment by (deregulated) operators. • Overly prescriptive. Minimum standards should be reviewed and allow for below the minimum where justified. • Aspirational targets not appropriate. Targets create false impression of success or failure. How will setting a target help? Car ownership does not necessarily equate to car usage. • Modal split is dictated by personal choice and cannot be targeted. People shouldn't be left with no choice but public and active transport if they don't want to or isn't convenient. • Continue with maximum parking standards in the Edinburgh Design Guidance of 2018, in accordance with SPP. • Overly complex and does not take account of operational or end user requirement. 	<ul style="list-style-type: none"> • Planning Advice Note 75 Planning for Transport provides the benchmark for mode share targets (Annex C). • Car-free now common in highly accessible locations, dwelling types should be assessed against target occupiers, location, accessibility of the site by non-car modes to local amenities/ facilities and places of work, measures proposed by the development to minimise car usage, as well as the surrounding context. • Revision to make it clear that there will be no provision in any development for car parking other than for disabled, servicing and essential visitors. • Car free development only possible for brownfield developments, sceptical it can be employed in semi-rural locations. • Targets will need to be enforceable. • Only feasible with step change in public transport provision. • Resolve tension between policy aims and objectives with how developer see their markets. • Consider needs of displaced SME lost to redevelopment. Careful balance to still allow some parking to service traders, businesses, retail. • Access to car club and other shared transport services also alleviates level of parking.

- National Transport Policy stresses adaptability and notes that whilst the desire is for modal shift that may not always be possible.
- If evidence base is not available, could lead to inappropriate levels of parking allowed and overspill parking.
- Parking constraints especially in suburban development are not effective in transferring demand from private car to public transport.

- Consider underground parking.
- Extend and enforce CPZs and permits.
- Supported by a gradual removal of existing on-street parking to free up road spaces for public life and planting.
- Travel plans to mitigate against car use.
- Consideration for parking for social care visits. Continued reliance on retail centres predominantly accessed by car, so reducing parking will disadvantage some to access these facilities.
- Current cycle parking standards are too onerous and create dead frontages at ground level or reduce usable outdoor amenity space.
- Align cycle parking with BREEAM standards of 50% for student accommodation.
- An independent study should be undertaken to inform the level of cycle parking associated with student accommodation and general housing.
- Use of lease agreements in PBSA are used to discourage car ownership.
- Agree with controlling on-street parking in problem areas.
- Significant reduction in car parking standards may have a number of negative consequences, including providing for varying needs.
- Over emphasis on direct cycle trips fails to understand the varied travel patterns of all residents, 'trip chains' around tasks which necessitate bus or car use.

7B We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme.

Agree 74%	Disagree 26%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Key disincentive to car use. • Supports the creation of healthy inclusive public centre. • Requires infrastructure eg public lifts to cater for all mobilities and ability to walk longer distances. • Control of city centre parking is required to deliver City Centre Transformation. • City centre parking reduces land available for housing. • Provides space for planning for climate resilience (space for people, water and wildlife). • Ensure Tra 5 City Centre Public Parking is updated. • Support the introduction of a parking levy on employers and retailers in the City Centre to fund improvements in the public transport provision. 	<ul style="list-style-type: none"> • Only more car parking at a reasonable price will slow the death of the city centre. • We are of the view that restricting city centre car parking simply pushes this out to surrounding areas, with consequential adverse impacts. • Restricts potential investors in Edinburgh • Cost of parking is enough to make it prohibitively expensive to use car, with impact on deterring families from the city centre. • Reducing parking and narrowing streets causes more congestion. • Decide on case by case basis on merit. • Creates parking congestion in commuter areas. • Consider short to medium term behavioural impact of Covid-19 on bus patronage vs private car use. • 	<ul style="list-style-type: none"> • No parking provision other than for disabled, servicing and essential visitors. This must be done in tandem with phasing out on-street parking. • Manage commercial needs – deliveries etc. • Cut down on business travel to the city centre by remote working and meetings. • Provided that social care staff can visit city centre residents. • Must not negatively impact on liveability for city centre residents. • Coordinate strategies to avoid displacing parking elsewhere. • City centre bus services from semi-rural communities will need to be extended, and long distance safe cycle routes into the city centre. • Consider mobility hubs replacing parking see Bremen example with target of removing 6,000 cars from the city. • Clarify that this is 'additional car parking' compared to existing provision.

7C We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure.

Agree 82%	Disagree 18%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> Allocating more space to people and plants and less to cars, like widening pavements and planting street trees, “pocket parks” will have a significant benefit. Reduction in parking spaces, resident and metered, would be a disincentive for car use. Studies on public transit (busways) in Cambridgeshire have shown that the reduction in car parking spaces can be a powerful incentive for people to change to public transport or active travel. Copenhagen has demonstrated that restricting free and easily accessed car parking is a necessary element of a strategy to increase active travel and reduce private car use within cities. 	<ul style="list-style-type: none"> Change to EV will happen inevitably but until then shouldn't penalise non EV cars which are still unaffordable for most people. Not a progressive tax as until widespread tram route throughout the city, people will require to park cars. More clarification on management of EV infrastructure. Cycle parking not used. Policy should respond to accommodating demand, rather than controlling it. 	<ul style="list-style-type: none"> Council could work with developers to offer mobility management: charge a developer for each car park that is built, or allow them to use this 'allowance' to be put into providing public transport, car clubs, cycling infrastructure, etc. Promote car club as an alternative. Additional infrastructure needs to be sensitive to the historic environment. Better bike storage solutions as bike theft is an issue: explore secure cycle parking in back greens. Include on-street visitor cycle parking requirement. Electric vehicles: Any developments should make provision for both current (active) and future (projected) demand for electric vehicle charging infrastructure either on-site or as a contribution to a public charging infrastructure, co-ordinated by the Council in a similar way as it does with contributions towards the City Car Club. Ensure sufficient capacity within the electricity grid and sub-stations to accommodate demand. EV in all public parking areas and provide charging stations for electric wheelchairs

		<p>and mobility scooters, as well as 4 wheeled vehicles.</p> <ul style="list-style-type: none">• Must reduce congestion as well as air pollution so EV not the solution, reduce all car dependency.•• There must be flexibility within any parking policy to examine the specific nature of the business needs of a proposal, and not just that it falls within i.e. Business and Industrial.• Ensure adequate off-street parking and garages that is fit for purpose.• EV cars are not the solution to achieving carbon neutral status by 2030.• Clear guidance on the requirements and the future liability of EV charging, with Edinburgh Council managing all EV charging points.• Does control demand mean reduce demand?• Preferential tariff for electric cars is a regressive tax solution. When they are cheaper they will replace cars and be back where we started controlling private vehicles.• Electric cars are less environmentally damaging but not without a carbon footprint, and not the solution to achieving carbon neutral status by 2030.
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7D We want to support the city’s park and ride infrastructure by safeguarding sites for new park and ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Agree 89%	Disagree 11%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Use of park & ride should be encouraged and the provision of more sites close to other transport modes which are easily accessible to the city centre will reduce traffic and carbon emissions throughout the city. • Support for P&R facilities at Hermiston Gait to relieve Lanark Road West congestion; Gilmerton, Lasswade Road and Straiton with the potential to reduce volumes of traffic on three arterial Roads. • The allocation of new housing development should support the provision of park and ride facilities along the transit-based ESSTS corridors. • Essential to minimise the effect of the large volumes of commuter traffic from outside the city. • New developments should prioritise access to the park and ride, rather than the city centre. 	<ul style="list-style-type: none"> • Lack of ambition, 10 sites with a capacity of 10,000 would be a good target for today’s volume plus growth. Mass commuting underpins flexible workforce. Challenge for transport will be space, not air quality as technological advances continue. • Safeguarding is a constraint on flexibility. • Gilmerton proposed site is permitted for mixed use development, do not support formal park and ride. • Could encourage driving, increase demand for parking and contribute little to carbon reduction. • May ultimately encourage car ownership in the landward areas. • The current usage of Park and Ride is impacted by congestion that builds up in the lead up to these sites. The suggestions presented are still within the extent of congestion, reducing the effectiveness to reduce congestion. 	<p>OTHER SUGGESTED SITES:</p> <ul style="list-style-type: none"> • Additional parking capacity at Ingliston is urgently needed to avoid the current problems which can also result in overspill parking in and around the tram corridor. Likely to need further enhanced connections to the A8. • Consideration should therefore be given to safeguarding provision for a park and ride / interchange facilities at: Newbridge / Broxburn; the A90 at Craigiehall; Leith at end of tram route; on the A70 along with radical rethinking of bypass provision for the Water of Leith traffic corridor; Craigiehall makes provision for a 500-600 space Park and Ride facility to intercept traffic entering the city centre via the A90; and West Edinburgh associated with transit corridor (extended tram line shown on Map 11). This may assist those approaching Edinburgh from the M8, M9, Broxburn / Uphall and Winchburgh. • Better facilities in the NE of the city, support for Newcraighall extension, and run bus services to north, not just city centre. Or small scale Musselburgh with buses to Leith. • Edinburgh Orbital Bus Route (strategic cross-boundary commitment in SESPlan) could link to existing and proposed P&R sites.

		<ul style="list-style-type: none">• Additional P&R for traffic from Queensferry and beyond, a suitable location would be Burnshot in the A90 corridor.• The absence of park and ride facilities at Hermiston Gait / Edinburgh for M8 / A720 traffic is a significant gap.• The absence of a tram connection at the Hermiston park and ride significantly reduces its usefulness to West Lothian (and CEC) residents. This would greatly reduce the need for car use and create a tram link between HWU and the airport.• Car parks at Ocean Terminal have for the past c 20 years been operating in similar ways, offering free parking to substantial numbers of commuters every day. The introduction of the new Tram extension to Newhaven will create a new interchange and likely draw further demand. Potential for park and ride facility in the area to connect active travel, tram, shopping and commuter interchanges.• STPR2 Case for Change discusses the importance of sustainable travel provision / options for visitors. This should be a key issue for Edinburgh, particularly if the potential for attractions to be more distributed throughout the city is delivered. A networked system of Choose & Ride sites could be integral to achieving this. (see Transport Planning Objectives in table 10) and ensure these inform the Proposed Plan.• Wait to develop these until clear picture of travel patterns post COvid-19.
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		<ul style="list-style-type: none">• Some areas of the city (not in CPZ) are already be facto park and ride.• Take into account feasibility study into the provision of P&R facilities in north Midlothian. The proposed safeguarding of sites at Gilmerton Road and Lasswade Road may have some merit. The success of a P&R site is related to predicted passenger demand and desirability of location, sites too close together are less attractive. Consideration of the impact on existing facilities in neighbouring Council areas.• Re-schedule the timetable for new park and ride hubs in order to fit with the timescale for the LEZ and other initiatives. <p>Function and design of park and ride sites:</p> <ul style="list-style-type: none">• The existing Park & Ride sites are single function only and have no real sense of place or integration. Develop through a design led approach a concept for how sites can be developed: arrive and choose a range of modes (mobility hub), with integration of green infrastructure. Potential also as peripheral mixed-use hubs and the implementing proposed retail park regeneration.• Upgrade over time to provide slow charging facilities at each space.• Ensure surrounding rural landscape character is not compromised, include more screening tree/shrub planting and their maintenance.• Public transport from P&R sites should serve more destinations, not just direct to
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		<p>city centre. Public transport operators must be consulted with in order to determine whether servicing new P&R sites is feasible and/or preferred over expanding existing P&R sites.</p> <ul style="list-style-type: none">• The Edinburgh Waverley Western Approaches study now under way create an opportunity for a mainline station at Kirkliston or Winchburgh.• As park and ride sites catering for mode shift of commuters and visitors from mostly out with Edinburgh, this needs to be coordinated in line with the Regional Transport Strategy, and build on the findings from the SEStran Regional Park and Ride strategic study.• With exception of Sherifhall, all are oversubscribed.
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Choice 8 – Delivering new walking and cycling routes

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes.		
Agree 92%	Disagree 8%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Sustainable alternatives supports modal shift from the private car, and reduces impact on key, congested routes, and safeguards the health of citizens and visitors and achieve carbon neutrality. • Active Travel is about improving quality of life and quality of place. • Investing in infrastructure and support for walking and cycling can increase economic growth and vibrancy. Those walking and cycling tend to spend more money locally than drivers. • Potential to improve public and active travel for workers and visitors to industrial sites, for example the Promenade to Seafield site. 	<ul style="list-style-type: none"> • Cycle network aligned to footpaths is poor • Cycle paths on road (not segregated) is dangerous and causes congestion. Small minority actually cycle, takes road space away from buses. 	<ul style="list-style-type: none"> • Holistic network analysis required looking at arterial routes (with public transport and segregated cycling) and Low Traffic Neighbourhoods. • "Delivering new walking and cycle routes" is much less important than improving existing ones: pavement improvements, widening, more road crossings, traffic calming. • Review full network and identify gaps, deficiencies in quality. • Within historic areas an overall reduction in motorised traffic and enhanced and safe mixed cycle and pedestrian areas are a better solution than dedicated cycle only routes. • Over-engineered cycle infrastructure can impact on space and amenity. • Concern that by restricting loading and unloading, arterial cycle-routes could jeopardise the viability of local businesses. • Maintain historic setts to ensure they are safe for cyclists. • The integration of public transport will be important for promoting walking. • Create good links to and within areas with high SIMD. • Experiment with temporary infrastructure.

		<ul style="list-style-type: none">• Integrating these routes as elements of the multifunctional green and blue network, so they serve as habitat corridors.• Segregated cycle routes to avoid conflict with pedestrian users.• More joined up cross-boundary routes, which then link to local networks, which have connections to public transport, mobility/choose and ride hubs.• The criteria should be informed by the content of the STPR2 Case for Change report so that routes address the key issues identified.• Base criteria on taking pedestrians, cyclists, wheelers off the road space, to and through green / blue spaces, Country and Regional Parks, interesting landscapes, easy gradients and avoid poor air quality.• Criteria should assess how routes address gaps and missing links in the existing green / blue network.• Design should prioritise the needs of walkers and cyclists first, then other road users.• Routes should conform to the five characteristics in Cycling by Design, and as such should be accessible for use all year round and be wide enough to facilitate social distancing with good signage and provide bins.• Waterfront Promenade should avoid port operational land. The form of the proposed connection will require to take into account physical and amenity constraints. <p>Clarity should be provided on the</p>
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		<p>responsibility for funding, delivery and maintenance of these routes, and all costs set out in the Action Programme; contributions should be proportionate in line with Circular 3/2012.</p> <ul style="list-style-type: none">• Not clear how these routes link to existing network and how these will be prioritised over motorised vehicles.• Size of the City and distances to outlying areas such as Kirkliston requires a combination of travel options to allow full benefits including commuting and leisure trips to be realised.• Clarify if works to complete the River Almond walkway would impact on Craighiehall.• Ensure maintenance of existing routes before extending new routes.• Need a much broader engagement with local people to identify a genuine network of active travel routes.••
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8B As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals for the new plan to assist in delivering.

Agree 89%	Disagree 11%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<p>Specific support identified for:</p> <ul style="list-style-type: none"> • Edinburgh Waterfront Promenade, Pilrig Park to Pirrie Street link, A71 Cycle Super Highway • Routes to Curriehill Station and Water of Leith path. • Extend the Edinburgh Waterfront Promenade from Granton to link with the John Muir Way • River Almond Walkway from Cramond Brig to Kirkliston • Pentlands to Portbello link, and explore extending westwards through Colinton and ending up in South Gyle, and attention to crossing the A702 and A720 roads, and consider links between this route, the Braid Hills area and Burdiehouse Valley Park. 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Cycle and footpath link from the A90 to the A8 corridor, to enable Barnton/Cramond area and Queensferry NCR1 to travel to Edinburgh Park and transport links. • Waterfront Promenade should avoid Port operational land, take account physical and amenity constraints. • Collaborate with other councils on longer distance routes as a necessary component of modal shift in localised cross boundary journeys and for longer peripheral commuting e.g. connections along The Wisp/A7, the A701 and A702, to Niddrie Bing area, consider Shawfair to Newcraighall Station, junctions on the A720 City Bypass to become more user-friendly for non-motorised transport, grade separation of the Sheriffhall roundabout; A7 active travel super highway, connecting with planned improvements in Midlothian; completion of A8 link, including future links via International Business Gateway; SEStran planned Portobello to Musselburgh connection. Identify the Shawfair to Lasswade Road Cyclepath/Green Network • Significant gaps in the routes on the north west side of the city.

8C We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or submitted through consultation on this document.

Agree 87%	Disagree 13%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<p>Support for: Route towards Newbridge, Livingston and A71 super highway; from Balerno down the old railway line towards Kaimes Quarry for Kirknewton (partially replacing the existing NCR 75, which currently uses the increasingly busy Long Dalmahoy Road and the steeply graded Ravelrig Road); SW Edinburgh area - safe pathway to the Pentland Hills.</p> <ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Need to consider the impact of safeguarding these routes for active travel on other travel modes • Specifically protect pedestrians from cyclists on pavements, or narrow footpaths like the canal towpath. • 	<ul style="list-style-type: none"> • Increasing levels of e-bike ownership are a significant contributing factor in modal shift elsewhere in Europe, and should influence planning for the city region. • Engage with the appropriate parties for clear understanding of land ownership constraints, avoid allocations to deliver off-site links in third party control, unless the Council is prepared to intervene and deliver the link subject to financial contributions. Such contributions must be based on robust cost evidence. • Clarity of funding particularly for cross boundary interventions. The Council consistently interprets 'active travel' as predominantly cycling, and budgets accordingly. • Support for new strategic walking routes, must be in addition to enhancing walking provision throughout the city • The A70 corridor seems once again to be entirely ignored. •

Choices for City Plan 2030 Responses Summary

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'		
Agree 87%	Disagree 13%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<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 B&Bs. • 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. 	<ul style="list-style-type: none"> •

9B Create a new policy on the loss of homes to alternative uses.		
Agree 88%	Disagree 12%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • STLs 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 STLs 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.

10A Revise our policy on purpose-built student housing		
Agree 84%	Disagree 16%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<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. 	<ul style="list-style-type: none"> • Restricting development and management to HE 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. 	<ul style="list-style-type: none"> •

- 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.

- 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.
- 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.

Choice 10 – Creating sustainable communities

10B - Create a new policy framework which sets out a requirement for housing on all sites over a certain size		
Agree 84%	Disagree 16%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<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. <p>Need to consider biodiversity value of sites.</p>	<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 Ha. • 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 HNDA2. If additional housing is required more land should be released. • Should not apply to EBQ 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		
Agree 84%	Disagree 16%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<p>Housing complements existing retail floorspace and helps to best utilise available land and create sustainable mixed use communities within the urban area.</p> <ul style="list-style-type: none"> • 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%.

Agree 72%	Disagree 28%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<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. • 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 	<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.

	<p>housing in recognition of the range of alternative models for affordable homes.</p> <ul style="list-style-type: none"> • 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. 	
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11B Require a mix of housing types and tenures		
Agree 78%	Disagree 22%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<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. 	<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. 	<ul style="list-style-type: none"> • Addressed in density policy.

- 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.
- 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.

- Would constrain delivery on brownfield sites, on such sites CEC 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.

Choice 12 – Building our new homes and infrastructure

12A	Option 1-Council/Partners/Urban Area	Option 2-Market/Greenfield	Option 3-Blended approach
	76%	6%	18%
	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. • Other options would result in considerable scale of development on 	<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 CEC 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. • Would risk a housing land shortfall and result in complicated CPO delaying housing delivery. 	<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 CPO would mean there would be little or no uplift in value through change of use to residential, creating a heavy cost burden for the Council.

	<p>the edge of the city, loss of agricultural land and impact on the strategic road network and housing market of surrounding areas.</p>		<p>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.
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Housing Land Supply

	<ul style="list-style-type: none"> • 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. <p>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</p>
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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?
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		Supporting reps	Objections
12B	Proposed greenfield site - Calderwood	142	251
	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 NPF3. • 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 	

Choices for City Plan 2030 Responses

Choice 13 - Supporting inclusive growth, innovation, universities and culture

13A We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh.		
Agree 83%	Disagree 17%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Culture should be articulated across the plan as a whole. • Tourism sector may well be less sustainable in the near future. • Policies should support the development of not for profit and social enterprise. • It would give useful guidance for development management, where applicants propose a change of use or adaptability of a building in order to deliver projects and new business opportunities. • New policies for culture and tourism must include an assessment of the capacity of Edinburgh to accept more growth in these sectors without detriment to housing for residents and their quality of life. • The areas identified in Map 16 (Areas of Support) are too restrictive. • Success of this strategy depends on strong leadership and ownership from the Council, Edinburgh Business Forum, and the Edinburgh Partnership. The progress with the Edinburgh Economy Strategy and the Partnership working is not known. 	<ul style="list-style-type: none"> • Supporting increased tourism in a city suffering from over tourism is not helpful in creating a balanced or sustainable economy. • It must provide a healthy and receptive ground for visiting cultural activities and visitors but importantly must not lose sight of its all-important residents and those who work in the city. • A more nuanced and detailed approach is required, not all aspects supported, eg parts of CCT. • The Royal Highland Showground should be specifically identified. • Specific policy support should be provided by City Plan for the Riccarton Campus. • Wording should be expanded to provide policy support for commercial enterprises with strong relationships or functional links with the university and not permit other forms of 'standalone' development. • 'Good growth' must attract start-ups, individuals and businesses to live and work in Edinburgh – and retain those already living and working here - who give long-term nourishment to the city. <p>Does not need policy to support these good causes.</p>	<ul style="list-style-type: none"> • The Edinburgh Bioquarter should be allocated to allowed mixed use development, including residential development, with an updated master plan/place brief. • RBS Gogarburn should be identified as a Strategic Office Location and removed from green belt (RBS)

- Economic policies should support quality of life in the city, and in particular the quality of life of residents.
- The plan should commit itself to policies which foster a high value, high pay economy, and create a dynamic and economically successful city.
- Supporting a balance of sectors and opportunities.
- City Plan 2030 must have a range of policies in place which are sufficiently agile to enable a timely citywide response to the challenges and opportunities of a dynamic technological culture.
- The preferred strategy choice however is opaque.
- Innovation space and incubation space specifically covered and encouraged by this policy. This choice should also reference to research.
- By allowing for the use of EW 1d land at Seafield for energy recovery, as policy RS 3 provides for, the low carbon sector would be supported in a number of ways. One would be the facilitation of district energy based on supply of low carbon heat from an Energy Recovery Facility. The ERF in turn could assist and potentially host related businesses in the resource recovery sector.

Choice 14 – Delivering West Edinburgh

14B We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites.

Agree 76%	Disagree 24%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • CP2030 should take account of the West Edinburgh Study. • A balance is required between the west and south east of the city. • The Saica site (Site Ref: 281 ‘Turnhouse Road’) should be given strong support via a flexible site specific allocation. • Important to identify individual, sustainable sites which can support a range of uses including housing. • The West Edinburgh Spatial Consultation requires further refinement. It is out of sync with City Plan and the Transportation Assessment requires re-calibration to take account of the preferred choices within City Plan. • The requirements of Edinburgh Napier University should be considered in the future strategy for the area. • Transport to and from the airport is very poor. • In all strategic allocations there should be a requirement for Class 8 Use, as a retirement community. • Need to allocate land for specific uses in order to understand the transport infrastructure required and appropriate developer contributions. 	<ul style="list-style-type: none"> • The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl. • Unclear of the merit in considering future uses within West Edinburgh (without being site specific), when the vast majority of the study area is either currently allocated or is proposed to be allocated in this plan and thereafter delivered. It would make more sense to identify a wider “area of search” from the Firth of Forth to the Pentlands, to properly consider West Edinburgh in its fullest sense. • Existing road cannot cope with the traffic. • Concerns about coalescence and impacts on infrastructure in West Lothian for development close to the boundary. • An area of search approach provides no certainty beyond continuing uncertainty which would give rise to blight. • Proposed approach risks encouraging more inner city dereliction, and the using up agricultural land. 	<ul style="list-style-type: none"> • In the absence of the further work and outcomes that Stage 2 of the ESSTS will define, it is premature to identify Newbridge (Corridor 7) and omit West of Hermiston (Corridor 8) simply on the feasibility of a tram extension. Therefore both Newbridge (Corridor 7) and West of Hermiston (Corridor 8) should be considered further with all sustainable modes of transport including train and bus rapid transit as part of an area based study of West Edinburgh. • It is unclear from the Choices document how sites within the proposed ‘area of search’ will be brought forward, and under what policy criteria they will be considered. It is also uncertain how this proposal allows for robust environmental assessment of site proposals (both individually and cumulatively)

- Both west Edinburgh transport corridors should be supported.
- Support any proposal to improve public transport infrastructure in the West of the city including the tram extension to Newbridge and increasing capacities at park and ride facilities.
- Fife Council have concerns if the expansion of West Edinburgh was of significant scale.
- Safeguarding and utilising existing natural assets in a planned approach to development of strategic, interconnected and multi-functional green / blue networks is an essential part of delivering long term sustainable city growth in this area.
- Although we agree that City Plan 2030 should take account of the West Edinburgh Study findings when available, it will be important for it to be interpreted in consultation with local communities.
- Large parts of the area identified as “West Edinburgh” is classed as flood plain and should be protected as part of a multifunctional green and blue network.
- It is however considered that the infrastructure which is proposed to West Edinburgh such as education facilities, can be of benefit to a wider area than just West Edinburgh.
- Innovation space and incubation space and research specifically covered and encouraged by this policy.
- Impacts of the future recovery of the City in a post Covid-19 environment and changing requirements.
- Tram route should be extended to other parts of west Edinburgh.

- Turnhouse Golf Course should be excluded from any development and kept within the green belt.
- The 'area of search' approach creates a permissive environment for the exploitation and destruction of the west of Edinburgh greenbelt.

- Needs to be coordination with development in West Lothian.
- Impacts of airport noise should be taken into consideration.
- As the area is noisy its an opportunity to locate noise producing developments.
- Mainline stations at Kirkliston or Winchburgh would ease pressure on existing infrastructure.

14B We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses.

Agree 54%	Disagree 46%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • The current safeguard and reference in NPF3 sterilises the site for alternative uses and this needs to be removed in order for the other uses to come forward, such as residential development, to accommodate sustainable and inclusive urban growth. • Reallocation for different uses could have a significant impact on Fife. • It is a good strategic site and has been safeguarded for long enough without any firm proposals coming forward. • The area is already mostly given over to commercial use and has good transport links however any developments would have to include an upgrade to the transport infrastructure. • 	<ul style="list-style-type: none"> • Includes reference to residential development – which should not be supported in an unsustainable and unsuitable location particularly where road infrastructure is already at or over capacity. • The identification of the Norton Park site for a specific reason and user does not justify allocation for other uses. If the reason for its identification and safeguarding have gone then there is no automatic justification for identifying the land for development without specific locational justification. • If the very western part of the site is developed as an extension of Ratho Station – then impacts on infrastructure and access to the showground should be mitigated. • Until such time as the next NPF does or does not identify Norton Park as part of the strategic airport enhancements National Development with other associated uses, City Plan 2030 is required to accord with the requirements of NPF. 	<ul style="list-style-type: none"> •

- As greenfield sites are not part of the preferred strategy do not agree with the change of the safeguard of this site.
- Question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city.
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14C We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange.

Agree 56%	Disagree 44%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • However, it will add substantially to the numbers of new housing already proposed for Maybury/Turnhouse (HSG19), increasing the need for infrastructure and access to greenspace. • Proximity to airport eg. noise, air quality etc. in respect of adverse impacts on residential amenity, it is not considered that it is suitable for housing. • If it is not being used as an airport it makes sense to release for other uses. • Critical that Sustainable Transport Corridors are implemented in conjunction with any proposed development if additional burdens on the 	<ul style="list-style-type: none"> • Question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city. • The City Plan should identify the site has split ownership now, this brownfield site is no longer all owned by the Airport. • At this stage it is premature to identify specific areas for development in West Edinburgh. 	<ul style="list-style-type: none"> •

bypass, bridgehead and further cross boundary trips are to be avoided.

- Provision required of adequate roads capacity at the Gogar and Maybury Roundabouts and the link road between these and impact on air quality.
- Mixed use development of Crosswinds should relate to other adjacent land uses and will benefit from strategic infrastructure provision.
- Appropriate joined up development providing new access and infrastructure in a coordinated manner would link with other allocated sites at Cammo and Turnhouse.
- Setting of A listed Castle Gogar should be protected (and mitigated) as far as possible.
- Depend on the nature of the alternative uses and their layout and design.
- Support measures to improve the Gogar Burn to address existing and future flood risk. SEPA currently reviewing it.

Edinburgh Napier University request that their requirements are considered by the Council in any future strategy for development, growth or expansion in the area.

Helps to justify £41m spent on Edinburgh Gateway.

- Danger of over saturation of development without the necessary infrastructure to support it.
- Until such time as the next NPF does or does not identify “crosswinds runway” as part of the strategic airport enhancements National Development, City Plan 2030 is required to accord with the requirements of NPF 3.
- Pre-empts the findings of the West Edinburgh Study and the content of NPF4.
- If there is a realistic expectation that these sites will come forward for development they should be included within the Plan.
- Traffic at Gogar Roundabout is already congested in terms of existing traffic and traffic generated from the Cammo proposals.
- The focus should be on existing sites within the current LDP in the first instance and where a broader mix of land uses at these locations can help to deliver the aims and objectives of City Plan 2030. Land at Edinburgh 205 should be prioritised ahead of new allocations.

Should resist any form of greenfield development. Air transport, passenger as well as freight will for certain in any imaginable future become less acceptable for obvious environmental reasons. So we should do nothing to further facilitate it, starting now.

15A We want to continue to use the national ‘town centre first’ approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities.

Agree 87%	Disagree 13%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • More focus on needs of residents and their positive effect on retail demand. • The role of town centres has changed and continues to change. Edinburgh is clearly the regional core for south east Scotland and as such the city centre has a clear and important role to play in enhancing and protecting this status. For this to be successful the appropriate transport infrastructure must be in place both locally and regionally. • Provided it is properly accessible for local residents by public transport. • Not all leisure uses can be accommodated in a town centre location. • Recognise the value of opening stores in these locations to boost the vitality and viability of protected centres. Despite this, given the make-up and composition of some centres across the city this is not always feasible hence the development of ‘edge of centre’ locations which can help reinforce centres. • Covid 19 has had an impact on retail and impact on ‘over tourism’. • Concerned at an emphasis of its function as a tourist centre and regional shopping centre, rather than a centre for the city of which it is a part. • City Centre, while regarded as ‘healthy’ by many markers is being undervalued in this report, and that its status is more fragile than 	<ul style="list-style-type: none"> • The policy needs further review as online shopping has accelerated due to the corona virus crisis, a trend which is not likely to revert to what it was before. Therefore there may be a need to encourage other City Centre uses offering greater diversity. This would create a better visitor experience compared with the same national and international brands seen everywhere. • Need to recognise that what you believe the town centre to be ... has changed ... many see the town centre mentality being something of a misnomer now ... I believe we should stop using this ‘centrality approach’ and have something similar to London boroughs which are then governed and resourced equally. <p>Edinburgh City centre is under too much pressure already.</p>	<ul style="list-style-type: none"> • Policy should set out appropriate uses and for each level of centre. In line with the town centre first approach, the city centre should be protected and enhanced as the regional core of South East Scotland. The role and function of other centres should be set out with consideration for how circumstances may change over the Plan period. It is important that Policy is flexible to allow Centres, to adapt, respond to changes and to remain relevant in the future. Policy should recognise that Commercial Centres such as Ocean Terminal can offer established and well-connected sites which can support mixed uses including residential and office use to ensure their vitality and viability.

presented. Surprised that there is no mention of its status as a World Heritage Site and as a Conservation Area and the responsibilities therein.

- Town centres are hubs for public transport and are easily accessible without private cars. Town centres, however, are often densely built up and can form canyons which trap emissions leading to poor air quality and health impacts on those who live and work in these areas. To address this, cars should be discouraged and public transport should be electrically charged.
- The Town Centre first approach should allow for some flexibility.
- Try and ensure that everyone in the city lives within easy reach of basic shops and services – the 20 minute neighbourhood approach.
- Small independent traders need to be both protected and encouraged to operate in town centres.
- Support for small convenience shops in new housing developments.
- Low vacancy rates are supported by the wrong type of shops (eg hairdressers and charity shops).
- When shared transport and reduced car access are used as part of a package, then mobility hubs can be provided with placemaking as well as just the basic transport provision. In this way new life can be breathed into town centres by creating centres for people not cars.
- Visitors should be encouraged to move beyond the City realm.
- Hope in doesn't result in increased commercial council tax for small businesses though.

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15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Agree 83%	Disagree 17%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • But the allocation of further land for development and this will result in the identification of new local centres. • Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. • The place principle must again be at the forefront of planning and decision making here. There may be occasions where a commercial needs study does not provide information on the non-commercial benefits of a retail or leisure development within a community. • We think the Commercial Needs Study needs a review having regard to the corona virus crisis which has emphasised the value of local centres but also small scale local provision within easy walking distance. • Yes, but how would new farm shops fit into this policy? • Much stronger action is needed to maintain and support local centres. • Over development for years. • Will strengthen and support centres. • Success depends on improvement in public transport and parking facilities to ensure that 	<ul style="list-style-type: none"> • While some areas maybe at capacity this is not the case in other localities (eg. Gilmerton). Again many town and local centres are restricted with little to no land availability for new retail/leisure provision. • Too prescriptive, too top down. • Do not fully agree with the conclusions of the Commercial Needs Study that there is no capacity or need for additional retail provision beyond Town/Local Centres. • Commercial Centres including Ocean Terminal have an important role to play in providing retail, leisure, community and visitor facilities. Commercial Centres will need to adapt to meet changing needs. • There should be a presumption in favour of any food and other necessary retail anywhere, it is very important to promote shop local wherever possible. • Not always be possible to provide new shopping in town and local centres and some flexibility may be required to permit development outwith local centres. The importance of food stores has never been so well highlighted than during the current Covid-19 pandemic. • Choice states that proposals will only be permitted where it is justified by the Commercial Needs Study. This an unusual approach, given 	<ul style="list-style-type: none"> •

all local shopping needs are within direct accessible reach.

- A more positive policy should be adopted which promotes small-scale shopping facilities where there is evidence of a lack of food shopping within walking distance.
- Cityplan should promote the reinvigoration town and local centres through partnership-based place-making involving CEC, local businesses and communities.
- In the post COVID-19 environment, consideration should be given to ensuring that everyone can access essential shopping services within walking distance.
- However local centres may also be important service-provider locations not solely suited to addressing a lack of food shopping. There should be a degree of flexibility particularly on changes of use applications.

Plan might benefit from giving flexibility for such uses in other locations where they are brought forward on a temporary basis to activate vacant sites or spaces, or where they meet particular community needs such as space for local/amateur groups.

that if a proposal is located within or 'edge of centre', of a town or local centre, then SPP fully supports such development as it is of benefit to the health and vitality of these locations.

- CNS acknowledges that qualitative improvements can still be required in certain pockets across the city.
- Competition is not a planning matter and it should not be for the planning system to protect existing out of centre retailers from this.
- The loss of certain local retail, commercial and community facilities can have a very detrimental impact on the communities that they are intended to serve. We have seen in the city centre the loss of many businesses that have provided essential services and employment to local residents as many have been converted into tourist-focussed enterprises. If the city centre is to remain a place that people want to live in a sustainable manner it is important that the LDP provides protection against uncontrolled change of use of such local businesses.
- There should be no requirement to justify new shopping or leisure development in existing town centres.
- Forcing people to walk to small scale proposals is social engineering.

15C We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

Agree 88%	Disagree 12%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • We fully support the LDP reviewing and identifying new town/local centres. We believe one such new Town Centre should be afforded to Gilmerton. • We support the review of existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas. • Many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. • Better integration and a more logical arrangement of villages, council wards and community council areas. This should be about sustaining communities each with a ‘hub’ offering local services to which local people can identify and interact. • Any such review has to start from the premise that existing town and local centres are to be encouraged. It will mean upping the infrastructure in most if not all cases. • There are many clearly defined out of town existing village centres which require policies directed at supporting them. • Accessibility of public transport should also be a consideration. 	<ul style="list-style-type: none"> • The intention to ‘support’ walking and cycling sounds more like an intention to impose walking and cycling. • 	<ul style="list-style-type: none"> • This work should be undertaken and consulted on ahead of the proposed plan consultation. • MLC considers that development of any new retail centres should be small scale, focussed on convenience shopping, and restricted to cases where new or existing communities are poorly served by convenience shopping within walking distance. Any such development would have to be fully justified, and the effect on the vitality and viability of any existing centre would have to be considered. • After Coronavirus, regarding "how retail trends develop" etc - and may be among the first to require revision.

- Consideration should be given to reducing the boundaries and restricting the areas of centres or including residential as appropriate uses in the centres to support existing services and to combat the decline of High Street retailing.
- Town centre boundary for Portobello be extended to incorporate the Aldi store.
- What if we thought of Edinburgh as a network of 15 minute neighbourhoods?
- Wary that such changes have the potential to undermine existing centres if redrawn boundaries lead to important parts of existing centres being excluded, existing protections being removed or diluted, or new local centres being created simply to justify new developments.
- Support the policy option particularly the Town Centre designation indicated for Leith Walk and local centres in Leith.
- Development of arterial routes must protect existing local centres.

15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Agree 55%	Disagree 45%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • No-one knows how things will be post Covid19, so a huge amount of rethinking may need to be done. That will require flexibility of approach. • It's an evolving and changing sector and it will be easier to adapt and change if it is Supplementary Guidance. • Although you may need the flexibility as habits change. We should also be more imaginative with existing town and shopping centres to breath new life into them. • In supporting the continuance of Supplementary Guidance recognise the inherent flexibility of this approach, but this implies that resources will be available to enable this flexibility and agility in speedily changing markets. • It would appear be more easily tailored to the local environment than centralised guidance being included in the full City plan. However, we do feel that the existing supplementary guidance could be enhanced, or more carefully enforced than it appears to be at times.. • Guidance should be extended to local centres across the city too. • But it requires to be subject to proper consultation and approval process to ensure adequate scrutiny. • 	<ul style="list-style-type: none"> • Support the option to remove supplementary guidance, preferring to embed such guidance within the plan. This might be done as appendices. However, this preference does not preclude supplementary updates to the Plan. • Policies on retail should be part of the development plan and thoroughly considered through independent examination. • Support the use of retail guidance in the Plan. Incorporating the guidance in the Plan gives a surer way of ensuring the guidance is aligned with other guidance, policy, requirements, etc. of the Plan. <p>Supplementary guidance is too complicated and tends to allow loopholes.</p> <ul style="list-style-type: none"> • Use of guidance sounds like an imposition. 	<p>We are doubtful about the ability of planners to predict with any accuracy the future pattern and trends of retail activity. We are not sure of the value of these options.</p> <ul style="list-style-type: none"> •

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh.

Agree 58%	Disagree 42%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> We see hotel provision as part of mixed developments with retail, commercial and residential development. New hotel provision should not be at the expense of existing residential accommodation. The City centre has already been overdeveloped with hotels etc. Although there is often local resistance to hotel building, it will be needed if we are moving away from offering full property short-term lets. We support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. We support the need for differing grades of Hotel, location and throughout the city to ensure the spread of related economic benefits. Some flexibility should be built into this policy so as not to preclude hotel development in other viable and suitable locations. However requirement for hotel sites to deliver 50% as residential accommodation may render a number of sites as unviable. This is supported only for more higher value upmarket proposals encouraging higher spending visitors. CEC should be mindful that the impact of COVID-19 on Edinburgh’s Tourism sector. There is no clear picture on the outlook for 	<ul style="list-style-type: none"> Hotels come in all shapes and sizes and respond to varying demand profiles. You should not control where/how some of these more boutique or niche hotels are proposed. Tourism industry leaders have admitted there is an over-supply in hotel rooms. They state this is already having a “negative impact” on occupancy levels and room rates, even before a string of proposed new developments across the city are either completed or come up for planning permission. Supporting unabated hotel provision in local, town and commercial centres without an evidence base of the demand runs the risk of undermining the provision of suitable sites for conversion or new housing under Choice 12A. Before Covid-19 this was an important area of jobs, investment and economic growth for the city. it is too early to say if there will be long term changes to the growth of the tourist market and the plan should be flexible to adapt to any change in expected hotel demand. Hotels are a key economic driver for the City and the most appropriate location is the City Centre. Whilst the above locations should also be encouraged, so should the City Centre. An assessment is needed of how many hotels of different types Edinburgh requires. This is related to an assessment of the capacity of Edinburgh to continue to accept tourism growth. 	<p>Why would we need to take action to support more hotels? These are commercial enterprises.</p> <ul style="list-style-type: none">

Edinburgh's tourism sector post CoVid19. The city has a far stronger international visitor profile than Scotland as a whole (44% v 23%), which in most circumstances would be considered a strength, but is now a real challenge as this market is likely to be far slower to recover, so demand levels are likely to be substantially down on 2019 levels for years to come.

- As long as any building goes hand in hand with housing as outlined in other parts of the report.
- Hotel development should be allowable anywhere in the city centre.
- Ocean Terminal could support new hotel and tourist accommodation provision including short-stay apartments. Hotel provision at Granton would help bring about proposed tram line.

New hotel construction, often on brownfield sites, prevents the use of such sites for housing.

- To protect the viability of the city's existing hotel stock and the jobs of those that they employ there should be a moratorium on all future hotel development for the foreseeable future.
- Residents first, visitors second.

16A We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Agree 89%	Disagree 11%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Consideration could be given to health or social needs being used in commercial sites; rehabilitation, GP, health checks, community services etc. • Meeting demand for alternative uses such as increased leisure provision maintains vibrancy and attractiveness of local centres. • We agree that flexibility in approach will help to address the changing nature of retail and leisure uses and adapt to the way we now live in the city. • Inevitable given changes in retail trends and post-Covid considerations. • This could bring more mixed use/evening activity. • With falling demand for retail floor space and a national over provision this policy seems appropriate and essential. • The demand for retail space has dropped in general, with a move towards consolidation in prime retail centres and locations. This means a lack of demand for many previous retail stores which now need a new purpose. If a change of use can be successfully promoted, this will retain footfalls and activity in the city. • The irreversible trend is ‘big’ retail being killed off by the internet, and for smaller specialised retail to adapt and develop. Similarly with hospitality, big chains are struggling. All this 	<ul style="list-style-type: none"> • I think there should be large-scale shopping opportunities in cities that don't require having a car to travel to out-of-town commercial centres. • Wouldn't want to see wholesale takeover by leisure forcing closure of remaining shops. • Some of Edinburgh's traditional shopping centres or "high streets" are in a relatively healthy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. • Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradual loss of character in many local shopping streets as major chains and charity shops become more dominant. • We believe that healthy retail provision within the existing town centres is an essential part of the life of local communities, particularly for residents with less access to transport. • Retailer rely on other retailers to provide footfall. • Not sure how that could be achieved when we are trying to reinvigorate our centres. • This should be related to an assessment of the capacity of Edinburgh to continue to accept tourism growth. 	<ul style="list-style-type: none"> • Increased leisure facilities in the outskirts could be welcome.

was happening before Covid19 which has rapidly accelerated the change.

- Commercial Centres should be permitted to accommodate any growing demand for retail and leisure floorspace.
- The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre.
- New residential development, either as redevelopment or conversion, should be supported when it can be demonstrated that the increase in resident population or the decrease in vacancy would improve the centre. The seven existing Commercial Centres in Edinburgh play an important role within the defined hierarchy of centres. They are spatially dispersed across the City area and are as 'local' and easily accessed for many consumers as the sequentially preferable town centres or local centres.

- You should not disrupt the natural demand vs supply approach. The use of space naturally develops based on demand.
- The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre. New development, either as redevelopment or conversion, should be supported when it can be demonstrated that the decrease in vacancy would improve the centre.
- Too prescriptive.
- Leisure provision is wholly appropriate within Commercial Centres, complementing the existing retail offer and improving the attractiveness of a centre to consumers.

Market interest for leisure uses at Commercial Centres is clear and additional flexibility to accommodate such uses on sites such as Meadowbank Retail Park is welcome and positive.

16B We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres.

Agree 90%	Disagree 10%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> Concerns with placing too much emphasis on locations at Edinburgh Park/ South Gyle, the International Business Gateway and Leith to deliver substantial new levels of office floor space. These peripheral locations do not have the same level of occupier demand as the city centre. The Plan should acknowledge that these locations are preferred locations for office use in the City and that mixed-use development (commercial, leisure, housing, hotels) in these locations would be appropriate to complement. Failure to do more than simply 'support' office development in these locations, rather than resist it elsewhere, will dilute the delivery across the city and undermine the success of the policy. As a consequence, for part A to succeed in meeting its objectives, parts B, C and D are unnecessary and should not be pursued as part of the LDP. The changing work practices enforced through COVID-19 restrictions are likely to have long term structural implications. Therefore recommend that CEC review the office supply and demand assessment before finalising their proposed office policy. Any proposals for additional office space within or outside of the strategic locations should be subject to critical assessment of likely demand. However, as Edinburgh is the regional core for south east Scotland it is essential that CEC 	<ul style="list-style-type: none"> There are already discussions going on in the commercial property sector about companies reducing office space to save costs now Covid19 has shown them how easy it is to operate with staff working remotely. This will radically change availability of office space and most likely reduce demand considerably. This proposed preferred choice of promoting office use suggests a restriction of other uses at South Gyle when elsewhere in the plan (choice 2, map 2) it is suggested that the area could accommodate high density residential use. The proposed choice appears to go against the overarching principles and policies of the plan which seek to encourage all forms of development in the most accessible locations. 	<ul style="list-style-type: none"> This should not preclude the opportunity to introduce a greater mix of uses in these areas. Leith Docks is identified as a potential location for new business and industry. We are aware that it is currently an industrialised area, nevertheless because it is in the broad vicinity of Imperial Dock Lock, Leith SPA any potential impacts must be properly assessed and the forthcoming LDP ensure that this site is safeguarded.

engages in a regional collaborative approach to strategic office space provision so neighbouring partner authorities are not negatively impacted.

- Yes, in principle. We note the statements about the significant demand for office space in Edinburgh, but we are aware of a number of instances, where recently constructed office buildings have remained empty for several years before occupation. What are the reasons for this and can these be mitigated? Could empty office buildings have a temporary use for accommodation?
- The market fundamentals for new office development are strong, with high take-up of available space and rental values around £35 per square foot. These rental values are among the highest in the UK outside of London and the south east of England.
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16C We want to support office development at commercial centres as these also provide accessible locations.		
Agree 90%	Disagree 10%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • What support will there be? Active, or passive, by not objecting to new proposals? Impact of Covid 19? • Providing that there is an allowance to repurpose the space in the event that it is clear and demonstrable that there is no demand for office accommodation as proposed. • Policy should support office use in Commercial Centres in light of the accessibility of this space and changes in retail trends which may mean more vacant retail space in commercial centres which could be adapted to accommodate alternative uses and to increase the vibrancy of the Centre. • In addition, City Plan 2030 should recognise the growth of home-working (full-time and occasional) encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes. • Commercial centre adjacent to office space provides the possibility of nearby leisure and refreshment activities for office workers and the ability to use spare time and lunch breaks to make purchases. It also provides a ready supply of potential clients nearby to the commercial development. • No objection to this as long as any development is supported by appropriate transport infrastructure. If it is to be located on the west side of Edinburgh, consideration must be given 	<ul style="list-style-type: none"> • We doubt if the demand will be there, except as part of the new pattern of working. • 	<ul style="list-style-type: none"> • A policy that supports and encourages rather than requires office development to be in commercial centres would be preferable. • Question how this may work in practice and consider that there may not be strong occupier demand in these locations. •

to cross boundary travel in consultation with partner authorities.

- The policy is necessary to meet demand when there is limited scope for development of strategic office centres within the central area.
- We agree but only where there is a clear economic case. Otherwise the office could become a liability if it remained unoccupied.

Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure.

16D We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments.		
Agree 78%	Disagree 22%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • There are already discussions going on in the commercial property sector about companies reducing office space to save costs now Covid19 has shown them how easy it is to operate with staff working remotely. This will radically change availability of office space and most likely reduce demand considerably. • Locating space in the city centre would make use of existing good public transport links and would benefit from any proposed new/improved infrastructure. • We agree and the loss of suitable office development sites has been a concern in the city. Any requirement should only be demanded where a development scheme suggests a clear opportunity for the use of the office space. • The policy is necessary to meet demand when there is limited availability of sites for 100% commercial development. • Reservations about the use of the term "significant". Edinburgh is unique in having a strongly residential city centre and benefits from residents keeping the city centre. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. The level provided should be tailored to the specifics of each site, rather than a one-size-fits-all approach. 	<ul style="list-style-type: none"> • The Choices document does not explain how "significant" the requirement for office floor space should be. The Council is also promoting at the same time a brownfield housing development strategy. Is the requirement for "significant" office space consistent with this? The Council will also require to demonstrate in preparing any future policy that the requirement for "significant" office space will not have an adverse impact on development viability. • This could be supported, but only in areas with demonstrable demand and appropriate social and transport infrastructure to support it. It is important to note that the impact of Covid-19 is not yet clear but there could be implications for the office sector. • So far mixed use development has meant offices, hotels, retail, bars and entertainment and no housing. This is not mixed use development and we would not support yet more offices. • Let the market decide, within the limits of an overall plan. • Large offices do not need to be located in city centres. Their presence will increase the need for commuting and create empty spaces once they close at the end of the working day. There will need to be some offices to provide services and employment for people living in the city centre but the use of the word significant is not appropriate. 	<ul style="list-style-type: none"> • This can be encouraged but should not be a requirement if it would preclude very good developments that did not include office space from coming forward. • Delivery of office uses within mixed use development will be dependent on market forces and should not be forced upon developers of those sites.

- For the vitality of the City, employment should be encouraged to return to the City Centre. It has been the replacement of offices by hotel development that has been a major factor in the decline of viable retail outlets.
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- Not sure we want a policy that always prioritises office floorspace over other uses, e.g. hotel/residential/shopping/leisure. It is possible to deliver all of these functions within the same building?
- Some locations within the city centre will be more suitable to office development than others. Request that any future mixed use planning submissions are considered on their own merits, rather than the Council enforcing a 'blanket policy' requiring a certain percentage of any mixed use development for office floorspace.
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16E We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent.

Agree 65%	Disagree 35%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Reduced need for office space will allow more housing development so reduce the office space to housing ratio. • The important issue is to secure the successful and sustainable regeneration of the area. It is important therefore to remove unnecessary planning obstacles that impede the development of residential properties in the area. • An area of Leith (around Victoria Quay) has been designated as a strategic office location on maps 21 and 22. We note that much of this land comprises former commercial units which have been converted into residential flats (particularly at upper levels). We would therefore suggest that this area is widened and allocated for a mix of uses so that offices can come forward alongside residential. It will be important for the emerging local development plan to ensure that policy is in place to protect existing employment uses in Leith and encourage office development as part of any residential development. • Agree in principle however support more mixed use sustainable communities rather than purely office or single use. 	<ul style="list-style-type: none"> • What is the priority - offices or homes? • I'm in favour of residential development that includes alternative ground and basement floor uses e.g. commercial, business, retail, etc. This could also include nursery provision, GP surgeries, etc. • It is unclear which areas have residential development consent. As detailed our preference is to improve office, light industrial and manufacturing provision with the area. • As worded, this is contrary to multi-use development policies. • We have a high demand for housing in Leith. Mixed use housing with small scale business, retail, creative industry start-up space, is in keeping with the area's heritage. • Land shortage of housing already being experienced in Edinburgh. If followed through - a site of commensurate scale must be identified. • 	<p>This should be done in consultation with the landowners.</p> <ul style="list-style-type: none"> • Leith Strategic Office Location could be extended to include Ocean Terminal to reflect potential for this site to be redeveloped to provide office space alongside other mixed-uses including retail, food and drink, leisure, tourist accommodation and facilities.

16F We want to continue to support office development in other accessible locations elsewhere in the urban area.		
Agree 83%	Disagree 17%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
	<ul style="list-style-type: none"> • If someone wants to develop an office there shouldn't be any in principle objection. • Support the idea of office development in the New Town area particularly focused on addressing the needs of residents. There is an increasing trend towards work portfolio careers and working from home (which has been accentuated by the Covid-19 pandemic) and we would support the development of office space on a short term lease basis and for small companies and single individuals as a way to encourage entrepreneurship within Edinburgh. • We advocate the creation of mixed use neighbourhoods. • Office use within the strategic centres is supported but the emerging development plan needs to accept that the loss of office use to alternative uses can be beneficial. As the requirements for offices change over time, a policy which requires their retention will not necessarily retain employment – which should be the aim of policy. • It is necessary to support the market demand for mid to smaller offices . The travel demands help to justify the cost of transport links to urban areas . • People would like to travel less and work closer to home, and this would reduce congestion in the city centre. • Provided it is demand led. 	<ul style="list-style-type: none"> • We do not support office development in other accessible locations elsewhere in the urban area. • Impact of Covid-19 changing demand and availability of office space. •

- Where these are developed as mixed use, sustainable as well as accessible locations.
- Should recognise the growth of home-working encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes.
- Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces (offices and/or workshop spaces).
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16G We want to identify sites and locations within Edinburgh with potential for office development.

Agree 77%	Disagree 23%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Agree. These should be served by public transport to enable sustainable commuting. • Support but request that any future designations are 'market informed' based on current requirements and demand. • Encourage dialogue with neighbouring local authorities to understand where business location or co-location could increase inclusive growth without detriment to the business itself. It should also take account of new working practices resulting from COVID-19. • Office development should be a key part of the plan, including potentially safeguarding some core parts of the wider city for the promotion of offices. However, as a ten year plan the city may need to amend proposals in the light of market experience and appetite. • Gilmerton Gateway should be identified as such a site. • ONLY if a) this is on direct public transport lines and doesn't require additional parking provision b) the offices are part of mixed-used • 	<ul style="list-style-type: none"> • This should really be demand led. If there is a city centre zone and regional hotspots where office use is supported, it should not need to be supplemented. The majority of office occupiers will gravitate towards the established markets in areas with the appropriate infrastructure. • We wish to encourage more mixed use development. • Surely that is for property developers to do. • Impact of Covid 19 will radically change demand for office space. • 	

16C We want to introduce a loss of office policy to retain accessible office accommodation. Or we could introduce a 'loss of office' policy only in the city centre.		
City Wide 42%	City Centre 25%	No change 32%
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> Edinburgh city centre has been unsustainably weighted to tourist and commercial development in recent years, and in order to maintain a mix of local employment opportunities we would encourage the maintenance of existing office space. This might change as a result of Covid 19. There is a need and market demand for office space at locations other than the city centre. Support in the context set out with existing office space provided as part of denser development. A 'loss of office policy' only in the city centre would disadvantage areas like Leith capable of accommodating employment uses as part of an accessible mixed community. Supports a loss of office policy city-wide to ensure the retention of existing office space throughout the city in a variety of accessible locations. Support a loss of office policy city-wide, and welcome the mix of small-scale office and commercial, cultural, and residential space which gives Leith its unique character. However concerns that extending a broad-brush 'loss of office policy' to Leith could reduce the opportunities for providing affordable housing on brown-field sites which currently have office use, or for amending an existing planning consent to convert office space to residential. 	<ul style="list-style-type: none"> I support a loss of office policy in the city centre and suggest the loss of office policy should just apply in the city centre. Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. The level to be provided or retained should be tailored to the specifics of each site, rather than a one-size-fits-all approach. This is excessive. Developing sites at increased density in central areas will be challenging given heritage constraints. It would be more reasonable to allow change of use if it could be demonstrated that the existing use was no longer marketable. Covid-19, an issue which is likely to change the requirements for foreseeable future. It may be the case that in future more homeworking is encouraged by employees, leading to less traditional office space being required. In such changing times the policies should remain as flexible as possible. Risk of properties remain vacant instead of being redeveloped. If policy is required, there should be an exception for offices that are no longer fit for purpose and that these can be redeveloped as the market demands. There should also be a recognition that the physical constraints of listed buildings in the city centre may not be capable of meet modern office 	<ul style="list-style-type: none">

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requirements on a financially viable basis and existing offices may not currently be located in the most accessible locations.

- Request that any new policy contains a provision which allows small-scale changes of use.
- For the vitality of the City, employment should be encouraged to return to the City Centre. It has been the replacement of offices by hotel development that has been a major factor in the decline of viable retail outlets.
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16.2A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations; Leith Docks, Newbridge, Newcraighall, Edinburgh Airport Crosswinds.

Agree	Disagree	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<p>Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223</p>	<p>Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121</p>	
<ul style="list-style-type: none"> • It would be helpful to have these areas close to existing housing so that people do not have to travel so far to work. • There are opportunities to improve blue green infrastructure at all of these sites, perhaps some more than others. Although they will be complex to develop and require partnership approaches to deliver but will be worth the effort because they will result in multi-benefit, enhanced natural capital, sustainable, resilient places. • Premature to identify Crosswinds and Newbridge in advance of conclusion of the West Edinburgh Spatial Strategy, the findings of which should inform the LDP. • There is an urgent need for modern business space, including industrial and logistical space, to support distribution and other business services at a local level. • Many of these industrial estates will be close to the end of their building cycle life in the near future. Also many of these industrial estates are in areas which are now predominantly residential use in nature. However, important that the stock of industrial accommodation is 	<ul style="list-style-type: none"> • Newcraighall is already massively overdeveloped. The Traffic infrastructure is bursting at the seams already. <p>We do not support Newbridge and Newcraighall as more sites in these areas could further erode green lands and prime agricultural land. Also the landscape quality of existing development is poor.</p>	<ul style="list-style-type: none"> •

maintained as in many instances industrial units are the cheapest business accommodation available. Therefore, it is critical to ensure that there is adequate industrial development land supply available. The new industrial development land supply must be in a well located area near to major transport links and have the correct infrastructure available.

- Crosswinds: The A listed building has already seen enabling development in its immediate vicinity. We would expect the listed building to be fully taken account of in any planning and layout of the new site.
- The Crosswind site offers unique connectivity with its proximity to the Airport and the tram and rail links at the Gateway station offering easy links to other parts of Edinburgh and the wider Scottish network.
- Seems sensible, provided the policy is flexible rather than rigid.
- Only support the 'Crosswinds' site if there are adequate improvements in roads capacity.
- Leith Strategic Business Centre is sufficiently close to be included in an early phase of a district heating scheme centred on an ERF at EW 1d Seafield. As is shown by examples in Sheffield, Nottingham, and throughout northern Europe (eg Gothenburg), the other locations could also be connected if the network was expanded to the full available energy potential of an ERF at Seafield. Leith Strategic Business Centre might also be supplied directly by a private wire electricity connection. In supporting business and industrial locations as set out in Choices we do

not support mixed use development on EW 1d.
It is suitable for business or industrial
development as per existing Emp 8 and for an
ERF as per RS 3.

16.2B - We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites.

Agree 77%	Disagree 23%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • A much clearer definition of the criteria and requirements is needed . • This could be supported, providing that there is an allowance to repurpose the space in the event that it is clear and demonstrable that there is no demand for office accommodation as proposed. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and welcome clear guidance based on best practice approaches. • Providing it is not imposed as a requirement on all urban sites. Many urban sites are not appropriate for business use, or a mix of uses and the appropriateness must be dependent upon the context to the site. • It is important to ensure that business space is linked to public transport network to enable sustainable commuting. • City Plan 2030 should recognise the growth of home-working (full-time and occasional). • Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces. • We need more space for new business both in the city and in new greenfield releases to create more sustainable communities. • However, we do not support a blunt approach to requiring new business space that will not be successfully occupied and traded from. • 	<ul style="list-style-type: none"> • It is not always practical, viable, desirable or marketable to provide for business space in greenfield locations. A criteria-based policy may be helpful if proceeding. • 1. We do not believe that providing a token amount of business space on a brownfield housing/mixed use site is viable and should not be adopted. 2. New business space on greenfield sites of scale should be promoted. • Market -led approach to business space in the greenfield locations should be taken and it should not be a requirement of place briefs. • Such an approach requires a critical understanding of the demand for business space in particular locations. This raises a further question over the Council's proposed approach to Place Briefs, which appears to exclude any consultation with developers and landowners. The proposed approach is very prescriptive, not only specifying particular use and scale but location within a site. • There will need to be a very clear justification for the displacement of viable businesses to make way for new housing development. It must be made clear why the development of business space on greenfield sites to accommodate businesses displaced from urban sites is a better option than leaving existing businesses where they are and instead developing housing on the greenfield sites. • 	<ul style="list-style-type: none"> • It should be ensured that site identification is subject to robust environmental assessment of site proposals (both individually and cumulatively). If the preferred choice is brought forward to the Proposed Plan, we would expect to see greater detail. • There is merit in identifying suitable sites for office development, however, there needs to be a flexible approach. There should be a general presumption in favour of office development in urban locations which are well-served by good public transport links and which meet locational requirements for businesses. • Should recognise the growth of home-working (full-time and occasional) encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes. Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces.

16.2C We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8).

Agree 87%	Disagree 13%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • A continued mix of employment in the locality as offered by industrial estates is essential for bringing a diversity of roles and people into our community. Further, welcome the provision of industrial space that could cater for high-end businesses that could be an essential part of an entrepreneurial plan for our city. • Should the Council still seek to pursue this policy, we would request that they include criteria to allow greater flexibility to be applied, assessing redevelopment schemes on a case by case basis. • However the Emp 8 schedule of sites is restrictive and will not allow for sufficient re-provisioning of business space across the city. The range and choice of sites needs to be extended on a city-wide basis. • But a lot of them are vacant, because they are too expensive for small or new ventures. • Need to protect light industrial and manufacturing provision in Leith. • There is a significant lack of supply of industrial property in the Edinburgh area and it will be important to safeguard even some older stock in order to support supply in the region. • Important to keep in mind industrial sites close to but outside the city boundary. These provide employment for many city residents and impact on city travel and housing. • Important to protect the existing industrial estates but think redevelopment proposals can 	<ul style="list-style-type: none"> • This needs to be assessed strategically in conjunction with delivery of housing on brownfield sites and the realisation of connected mixed use neighbourhoods. For example, industrial estates are typically not particularly densely utilised and often form a barrier between adjacent areas. In some case, particularly urban locations, these sites could be better suited to denser mixed use. • Provided a development is delivering jobs and employment it should be acceptable on employment sites, not solely Use classes 4, 5 & 6. • This protection should not be continued for older industrial estates that are at the end of their building cycle life and could provide much needed brownfield development sites, as long as this is coupled with a much needed land supply of new industrial development sites with proximity to transport links and infrastructure. • A flexible approach should be adopted - there is no point in protecting areas where no hope of the policy designation will ever be realized. • Industrial estates tend to be one-storey buildings, and become 'no-go' areas at night which are dark, unwelcoming, and create the risk of attracting anti-social behaviour. Buildings which contain a mix of uses and are active on a 24-hour basis are what is needed in a 21st century city. • 	<ul style="list-style-type: none"> •

be permitted when the loss of floorspace can be replaced elsewhere.

- The plan should continue to safeguard land at Seafeld (Site EW 1d) for a waste management facility incorporating thermal treatment with energy recovery.
-

16.2D We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs.

Agree 92%	Disagree 8%	
Reasons for agreeing	Reasons for disagreeing	Reasons for not answering/Other issues
<ul style="list-style-type: none"> • Considerable work is needed to develop a policy to deliver a city-wide freight strategy of interconnected neighbourhood goods distribution hubs that integrate with the aims of the City Mobility plan and the restriction proposed as part of the LEZ proposals. • While these distribution hubs could mitigate against the number of delivery vehicles entering the city, this could be offset by the volume of private car trips generated by people collecting from distribution centres. Distribution centres would have to be located where there is ease of access by public transport. Possibly park and ride sites could incorporate goods distribution hubs. • If this prioritises green transportation solutions, e.g. cargo bikes and electric vans. • The covid-19 crisis has shone a light on the need for strong logistical networks including local facilities. • However, it is not reasonable to allow goods distribution hubs to be built, developed and utilised in areas where the impacts would be detrimental to residents or infrastructure of the city. • This is CRITICAL. The City, especially the Centre and most especially the Old Town is severely negatively impacted by ridiculously oversize and inappropriate delivery and other service vehicles. 	<ul style="list-style-type: none"> • Plan should be flexible to be able to accommodate such proposed without "sterilizing" any particular pocket of land in the hope that that particular land use will be realized. • Further work need to be done to identify where these will be and consultation carried out ahead of the proposed plan. <p>More information is needed before a view could be properly formed.</p>	<ul style="list-style-type: none"> •

- We certainly see a great need for more locations around Leith for goods distribution hubs. Leith used to have lots of railway land and many large 'goods yards', but much of this land has now been lost to housing. The eastern edge of the docks, Seafield end, would be well suited for this. Therefore it should not be swallowed up by new building of houses, office /business units.
- Waste disposal will also need to be coordinated to avoid the pressures of numerous vehicles from different private companies contracted by different businesses.
- Such hubs are a good idea, but there's a danger of over-prescriptiveness and a less than optimal use of finite planning resources.
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City Plan 2030

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