

# Interim Integrated Impact Assessment – Summary Report

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## 1. Title of proposal

Draft Princes Street and Waverley Valley Strategy

## 2. What will change as a result of this proposal?

The Draft Princes Street and Waverley Valley Strategy (Draft Strategy) provides non-statutory guidance to support delivery of [City Plan 2030's](#) Place 1 – Edinburgh City Centre Policy and will represent a material consideration in the determination of planning applications.

The Draft Strategy outlines the Council's long-term plan for:

- the regeneration of Princes Street's urban blocks and buildings;
- the renewal of its public realm; and
- the future management of the Waverley Valley.

The Strategy brings together and expands existing planning guidance for development on Princes Street and sets out new planning considerations for the Ross Bandstand and Waverley Station Masterplan.

The Strategy supports delivery of [Edinburgh City Centre Transformation's](#) programme for the First New Town and Waverley/Calton catalyst areas by setting out new public realm proposals for the street's footways and adjacent public spaces.

The Strategy sets out strategic management considerations for the Waverley Valley, aligned to the Old and New Towns of Edinburgh World Heritage Site Management Plan and provides the context for a new improvement plan for Princes Street Gardens and other public greenspaces within the valley.

## 3. Briefly describe public involvement in this proposal to date and planned

As part of the preparation of City Plan 2030, the draft Strategy was scoped with input from key stakeholders including Edinburgh Urban Design Panel, The Civic Forum and Development Forum. The draft public realm proposals have also been considered by the Edinburgh Access Panel.

The findings of previous and recent public consultations on the city centre have also fed into the draft for consultation, including City Centre Transformation (2019), Actions to Deliver Edinburgh's City Mobility Plan Consultation Findings Report (2023) and recent market research to inform the draft Old and New Towns of

Edinburgh World Heritage Site Management Plan 2024-2035, which recommended a regeneration plan for Princes Street as a local priority.

The draft Strategy will be subject to public consultation with a range of communities of interest and place and the finalised version will be shaped by the outcomes of the consultation period.

#### **4. Is the proposal considered strategic under the Fairer Scotland Duty?**

Yes. The draft will contribute to the city’s approach to tackle socio-economic disadvantage by seeking to improve access to quality greenspace and public realm which is free to use.

#### **5. Date of IIA**

The initial scoping workshop was held on 30 January 2024. The IIA will be reviewed following the consultation and engagement period.

#### **6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)**

<b>Name</b>	<b>Job Title</b>	<b>Date of IIA training</b>
Andrew Smith (lead officer, facilitator, and report writer)	Senior Planning Officer, City of Edinburgh Council.	24 October 2023, 17 January 2019
Francis Newton	Senior Project Manager, Placemaking & Mobility, City of Edinburgh Council.	
Clare Macdonald	Senior Planning Officer, City of Edinburgh Council.	
Greg McDougall	Senior Transport Officer, City of Edinburgh Council.	
Lindsay Grant	Parks Programmes Manager, City of Edinburgh Council.	
Marie Davis	Senior Project Manager, Placemaking & Mobility, City of Edinburgh Council.	
Jenny Bruce	Old and New Towns of Edinburgh WHS Coordinator, City of Edinburgh Council.	6 December 2023
Susan Horner	Senior Planning Officer, City of Edinburgh Council.	

## 7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	<p><a href="#">Census 2011</a></p> <p><a href="#">National Records for Scotland Mid-year estimates 2019, 2020, 2021</a></p> <p><a href="#">The Scottish Index of Multiple Deprivation (SIMD)</a></p> <p><a href="#">Edinburgh by Numbers 2022</a></p>	<p>The City of Edinburgh has one of the fastest growing populations of any city in the UK.</p> <p>By 2043 the proportion of dependents (0-15 and 65+) will represent almost half of the population in Edinburgh (to 47.6%).</p> <p>The City Centre has a much higher proportion (29%) of residents in the 16-24 age group compared with an Edinburgh- wide share of 13%. Conversely, the city centre has a lower share of its population over 65 years of age (12%), compared to the wider city region (22%).</p> <p>Based on 2011 Census Data the wards with the highest number of health conditions (including Deafness, Blindness, Physical, mental health, learning disabilities etc.) are Portobello/Craigmillar and Liberton/Gilmerton. Both had 31% of their total reporting health conditions. The City Centre had the lowest proportion (22%).</p> <p>The SIMD details that the most deprived communities are in the peripheral areas of the city (e.g. Granton, Pilton, Niddrie, Saughton and Wester Hailes), furthest from the City Centre.</p> <p>The City Centre includes some communities which fall within the most deprived in the city (such as the Old Town, Princes Street and Leith Street) and others which are among the least deprived (such as New Town West and Dean Village) in Edinburgh.</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
Data on service uptake/access	<a href="#">Essential Edinburgh</a>  <a href="#">Edinburgh's retail survey</a>  <a href="#">Princes Street Gardens Interim Management Plan 2017-20</a>	<p>Monitors footfall, retail and hospitality sales. Metrics may be accessed but not reproduced.</p> <p>The Planning Service periodically surveys and monitors retail occupancy to inform policy.</p> <p>Reports daily high levels of use from residents and visitors.</p> <p>GIS analysis identifies over 15,000 homes within 800m or 10-minute walk of the Gardens. Most residents city-wide can access the Gardens within a 30–45-minute public transport journey.</p>
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	<a href="#">Census 2011</a>  <a href="#">The Edinburgh Poverty Commission's data and evidence 2020</a>	<p>Evidence in Edinburgh shows that the risk of low income and deprivation is strongly associated with:</p> <ol style="list-style-type: none"> <li>1. Households with adults or children in with specific characteristics such as: <ul style="list-style-type: none"> <li>• BAME backgrounds</li> <li>• Disability</li> <li>• Families with 3 or more children</li> </ul> </li> <li>2. Unemployment: Some 74% of all unemployed people in Scotland are in poverty, compared to only 5% of people in households where all adults are in full time work.</li> <li>3. Limited or insecure working hours: 29% of households which rely on part time employment are in poverty, as well as 26% of multiple adult households where only one adult is in full time employment.</li> <li>4. Low pay: Prior to Covid-19 the majority (65%) of people in poverty in Edinburgh were in working households</li> </ol>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>5. High housing costs: High housing costs in Edinburgh are estimated to have pushed 22,600 people in the city into poverty (29% of all people in poverty, more than double the Scottish average ratio). People in poverty are highly concentrated in rented accommodation in Scotland.</p> <p>6. Car ownership and access to a bike follow a clear income gradient (higher income having higher access) in urban areas. Users of public transport tend to be younger (16-29) and older age groups (60+)</p> <p>7. Access to transport is lowest around the periphery of the city, for example Niddrie, Baberton, Clermiston and Granton. Many of these are areas of high deprivation as ranked by the SIMD</p>
Data on equality outcomes	Yes	See data on 'Populations in Need'
Research/literature evidence	<p><a href="#">City Plan 2030 commercial needs studies</a></p> <p><a href="#">The Pedestrian Pound (2018)</a></p> <p><a href="#">The Value of City of Edinburgh Council's Parks (2014)</a></p> <p><a href="#">Valuing Edinburgh's Urban Trees (2017)</a></p>	<p>Background studies to inform City Plan 2030. Outlines future demand for office, industrial, retail and visitor accommodation to 2030.</p> <p>Living Street's research reveals improved public space in urban centres can boost commercial trading by 40%.</p> <p>Social Return on Investment study estimated each £1 spent on Edinburgh's parks delivered £12 of social, economic, and environmental benefits.</p> <p>Forest Research valued the ecosystem services provided by Edinburgh's urban forest as being worth £1.82m per year.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Public/patient/client experience information	<p><a href="#">Climate Vulnerability Index (CVI) Assessment</a></p> <p><a href="#">Edinburgh City Centre Transformation. Ideas generation and testing (2018) consultation on the draft Strategy in 2019.</a></p> <p><a href="#">Actions to Deliver Edinburgh's CMP – Consultation Findings</a></p> <p><a href="#">Thriving Greenspaces Vision and Strategy (2023)</a></p> <p><a href="#">Our Future Streets – A Circulation Plan for Edinburgh (February 2024)</a></p>	<p>The CVI concluded that the Old and New Towns of Edinburgh World Heritage Site is vulnerable to environmental, social and economic impacts from climate change, including flooding and heatwaves, which are already being experienced.</p> <p>Princes Street forms part of the recommendations in Edinburgh City Centre Transformation.</p> <p>A 'Transformed City Centre' was embedded as a Place policy in the finalised City Mobility Plan (2021).</p> <p>Feedback on priority measures included improving footways, expanding the cycle network, bus priority, junction redesign to protect vulnerable road users and expansion of 'School Streets'. Comments were received on the need to improve Princes Street, which received 275 'pins' as a street where respondents wished to see traffic reduced.</p> <p>30 year strategy to align with Edinburgh's 2050 Vision, focussing on greenspaces that are connected, thriving, valued and resourced.</p> <p>Sets out strategic roadspace allocation priorities and augments measures within ECCT to remove car traffic from much of the city centre, prioritise climate-adapted public realm and to prioritise walking, wheeling, safe cycling and for reliable and efficient public transport.</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
Evidence of inclusive engagement of people who use the service and involvement findings.		<p>In addition to the review or recent and previous consultations, the Draft Strategy was informed by key stakeholder input incl. Edinburgh Urban Design Panel, The Civic Forum, Development Forum and liaison with Network Rail during development of their Stage 1 masterplan.</p> <p>The public realm proposals involved meetings with Edinburgh Access Panel, HES and EWH, Police Scotland, Lothian Buses and Edinburgh Trams.</p> <p>The Draft Strategy will be subject to public consultation with a range of communities of interest and place and the finalised version will be shaped by the outcomes of the consultation period.</p>
Evidence of unmet need	<p><a href="#">draft Old and New Towns of Edinburgh World Heritage Site Management Plan 2024-2035</a></p> <p><a href="#">Review of 2007 City Centre Princes Street Development Framework (Feb 2021)</a></p> <p><a href="#">Princes Street Gardens Interim Management Plan 2017-20</a></p> <p>Princes Street Gardens Conservation</p>	<p>Market research focus groups recommended: a regeneration plan for Princes Street, a visitor levy to mitigate tourism impacts, and clarity around transport proposals in the city centre.</p> <p>Identified that whilst redevelopment activity has progressed in each block of Princes Street, across the blocks, the planned upgrading of Princes Street’s public realm remains outstanding.</p> <p>Outlines findings of Parks and Greenspace survey (2008-2009). Sets out accessible and routes at steeper gradients due to the Garden’s topography based on a site audit 1999.</p> <p>Priorities included:</p> <ul style="list-style-type: none"> <li>• provision of disabled access to the Terrace Walk and valley floor in the West Gardens</li> </ul>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	Management Plan (2003)	<ul style="list-style-type: none"> <li>to reduce the gradient of ramps from Princes Street by extending one or more pairs of ramps.</li> </ul>
Good practice guidelines	<a href="#">Edinburgh Street Design Guidance</a>  <a href="#">Getting Home Safely</a>  <a href="#">UNESCO recommendation on Historic Urban Landscape</a>  The Care and Conservation of Shared Georgian Gardens (2018)	Best practice guidance for street design to be followed during design.  Focussing on women’s safety, this toolkit for designers and transport planners promotes safety and security for all.  Emphasises the importance and urgency of integrating heritage conservation in development plans and climate action.  By John Byrom, published in association with Edinburgh World Heritage Trust to mark the 250th anniversary of Edinburgh’s Georgian New Town.
Carbon emissions generated/reduced data	<a href="#">Climate Emissions Analysis and 2030 City Sustainability Approach</a>	In 2020, the city’s baseline carbon emissions comprised: transport (31%), housing/domestic (29%), public and commercial buildings (23%), industry (17%).  The City Mobility Plan and statutory development plan support Edinburgh’s 2030 net zero target.
Environmental data	<a href="#">SEA Screening Determination</a>	The City of Edinburgh Council has determined that the Princes Street and Waverley Valley Strategy is not likely to give rise to significant environmental effects in relation to the Environmental Assessment (Scotland) Act 2005 Act and that Strategic Environmental Assessment is not required.



Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Risk from cumulative impacts		<p>The Strategy recognises inter-relationships between its components and takes a co-ordinated approach to manage change, avoiding significant cumulative or synergistic effects.</p> <p>The additional detail set out is not likely to have significant environmental effects, as established through SEA of higher-level plans, City Plan 2030 and Edinburgh City Centre Transformation.</p>
Other (please specify)		
Additional evidence required		<ul style="list-style-type: none"> <li>• People counters and park user survey for greenspace use.</li> <li>• Feedback on the profile of events attendees.</li> </ul>

**8. In summary, what impacts were identified, and which groups will they affect?**

Equality, Health and Wellbeing and Human Rights	Affected populations
<p><b>Positive</b></p> <p>Improved accessibility within the built environment:</p> <ul style="list-style-type: none"> <li>• to shops and services.</li> <li>• de-cluttering, reduced overcrowding and improved surfacing of public realm;</li> <li>• inclusive routes into and through West Princes Street Gardens for recreation, wellbeing and access to urban heritage; and</li> <li>• to Waverley Station for sustainable mobility.</li> </ul> <p>Welcoming, public rest points with inclusive seating provided in quieter spaces, fostering good relations between all users.</p>	<p>All</p> <p>Older people, disabled people, Families with a child under 1, carers</p>

<b>Equality, Health and Wellbeing and Human Rights</b>	Affected populations
<p>Wider areas of level public realm creating more space for interchange and walking and wheeling.</p> <p>Maintaining safe cycle access alongside strategic cycle network on George Street and public transport network.</p> <p>Maintaining and increasing vitality during the day and evening can improve surveillance and reduce fear of crime.</p>	
<p><b>Negative</b></p> <p>Relocation of benches on south footway of Princes Street to be balanced with the need for rest points.</p> <p>Redevelopment may affect locations used by people experiencing homelessness/rough sleeping.</p> <p>Princes Street already restricts access by car, which may in combination with other changes across the city centre, impact on people with a disability who rely on a car e.g. to transport certain mobility aids.</p>	<p>Older people, disabled people, carers</p> <p>People experiencing homelessness.</p> <p>Older people, disabled people, carers</p>

<b>Environment and Sustainability including climate change emissions and impacts</b>	Affected populations
<p><b>Positive</b></p> <p>Supports retrofit and energy efficiency of existing Listed Buildings and redevelopment of unlisted properties to achieve net zero. Some potential for green/blue infrastructure outwith prominent roofscape. Re-use of upper floors upgrades existing physical environment and makes efficient use of existing building stock. Safeguards regional focus for shopping, leisure and culture within ease of reach by sustainable transport.</p> <p>Access improvements to West Princes Street Gardens avoids tree removal, includes potential for SUDs, re-use of materials and renewed, climate resilient and biodiverse ground level planting to benefit amenity and urban pollinators.</p> <p>The valley's role in the city's blue, green and nature network and its contribution to the Old and New Towns of Edinburgh World Heritage Site is strengthened as part of a new improvement plan for Princes Street</p>	<p>Business community</p> <p>All, Different geographical communities.</p> <p>All, Older people, disabled people, Families with a child under 1, Carers.</p>

<b>Environment and Sustainability including climate change emissions and impacts</b>	<b>Affected populations</b>
<p>Gardens and the valley's public greenspaces, and through new public realm associated with Waverley Station.</p> <p>The value of the Station and its historic assets to the physical environment and in maintaining an open setting between the Old and New Towns of Edinburgh is emphasised, alongside principles for its adaptation to continue to support sustainable travel and ease of interchange as the city's main rail terminus.</p>	All, Different geographical communities.
<p><b>Negative</b></p> <p>Footway surfacing requires use of natural stone to reflect historic environment context and therefore embodied carbon, but this represents a long-lasting and durable material.</p> <p>Access improvements to West Princes Street Gardens will result in the loss of two pairs of historic ramps as per the Conservation Management Plan but the central example is retained.</p>	

<b>Economic</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <p>Promotes a mix of use and high-quality public realm, attracting investment, footfall and spending time in the city centre, maintaining ongoing access to retail and other services.</p> <p>Promoting temporary pop-up uses can support independent retailers and startups and redevelopment can generate jobs in construction and service sectors.</p> <p>Subject to investment in public transport and interchange, future potential for table and chairs permits at ground floor.</p> <p>Value of restored Gardens providing economic benefit as a high-quality destination. Ross Bandstand continues to cater for a range of community events and civic concerts. Improving the Station's offer and integration with Old Town, has potential to complement existing regeneration at the east end of the city centre.</p>	<p>Business community, Different geographic communities.</p> <p>Business Community</p> <p>All, Business Community, Different geographical communities, staff</p>

Economic	Affected populations
<p><b>Negative</b> Pressure to include table and chair permits without associated footway improvements could impact negatively on footway space for walking, wheeling and access to public transport.</p>	<p>Business community, Older people, disabled people, Families with a child under 1, Carers.</p>

**9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?**

Yes. The private sector will be responsible for delivering the majority of new development on Princes Street. Network Rail is the railway undertaker with responsibility to deliver the Waverley Station Masterplan.

Equality, human rights, environmental and sustainability issues will be assessed under planning applications submitted to the Council, with the ability to refuse consent, in the event that such matters have not been adequately addressed.

The Council and partner organisations would be responsible for improvements to the public realm, Princes Street Gardens and other public greenspaces in the valley.

**10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

The Communications and Engagement Plan will include a mix of staffed exhibitions/drop-in sessions, digital engagement and workshops with communities of interest and place. It is intended that appropriate consultation will include children and young people and the Edinburgh Accessibility Commission. The Draft Strategy will include a unique reference number for the Interpretation and Translation Service.

**11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

Having consulted with Historic Environment Scotland, the Scottish Environment Protection Agency and NatureScot, the City of Edinburgh Council has determined that the Princes Street and Waverley Valley Strategy is not likely to give rise to significant environmental effects in relation to the Environmental Assessment (Scotland) Act 2005 Act and therefore, Strategic Environmental Assessment is not required.

## 12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

- Consultation is expected to provide updated user surveys for the Gardens and other public greenspaces.
- Liaison with events team to understand origin data for events attendees.
- Provision of people counters in the Gardens may be explored through project development phase grants, wider city centre camera-based analytics or use of anonymised mobile phone data.

## 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Ensure the consultation takes into account the needs of all people with protected characteristics.	Andrew Smith, Senior Planning Officer	End of consultation period.	Q3 2024
Relocation of benches on south footway to be balanced with the need for rest points.	Francis Newton, Senior Project Manager, Placemaking & Mobility	Finalisation of Strategy	Q4 2024
Redevelopment may affect locations used by people experiencing homelessness.	Francis Newton	Finalisation of Strategy	Q4 2024
Consider effect of existing and proposed restrictions within the city centre upon people who rely on a vehicle e.g. to certain transport mobility aids.	Francis Newton	Finalisation of Strategy	Q4 2024

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
Acceptability of table and chairs permits in absence of increased footway capacity	Francis Newton	Finalisation of Strategy	Q4 2024

**14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

Yes, replacement of the streetscape materials will involve some embodied carbon. This will be subject to the Council's procurement processes and meeting with materials approved for use within the historic environment. Re-use of materials and recording, as well as a conservation led approach will minimise impacts of adapting ramps between Princes Street and West Princes Street Gardens.

**15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

The IIA will be subject to review at each stage of project and by governance arrangements for City Centre Transformation and City Mobility Plan.

**16. Sign off by Head of Service**

**Name** David Givan, Chief Planning Officer and Head of Building Standards

**Date** 10 June 24

**17. Publication**

Completed and signed IIAs should be sent to:  
[integratedimpactassessments@edinburgh.gov.uk](mailto:integratedimpactassessments@edinburgh.gov.uk) to be published on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)  
**Edinburgh Integration Joint Board/Health and Social Care**  
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