

City Plan 2030

Environmental Report

January 2025

Post adoption statement



City Plan 2030

Strategic Environmental Assessment

Post Adoption Statement

January 2025

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View more information at: [City Plan 2030 – The City of Edinburgh Council](#)

City Plan 2030 Post Adoption Statement

Contents

1. Introduction

1.1 Purpose of this Statement

1.2 Key Facts

1.3 SEA activities to date – a brief summary of stages

2. How environmental considerations in the Environmental Report and the consultation responses have been taken into account in the City Plan 2030

3. The reasons for choosing the City Plan 2030 as adopted, in light of the other reasonable alternatives considered.

4. Monitoring

1. Introduction

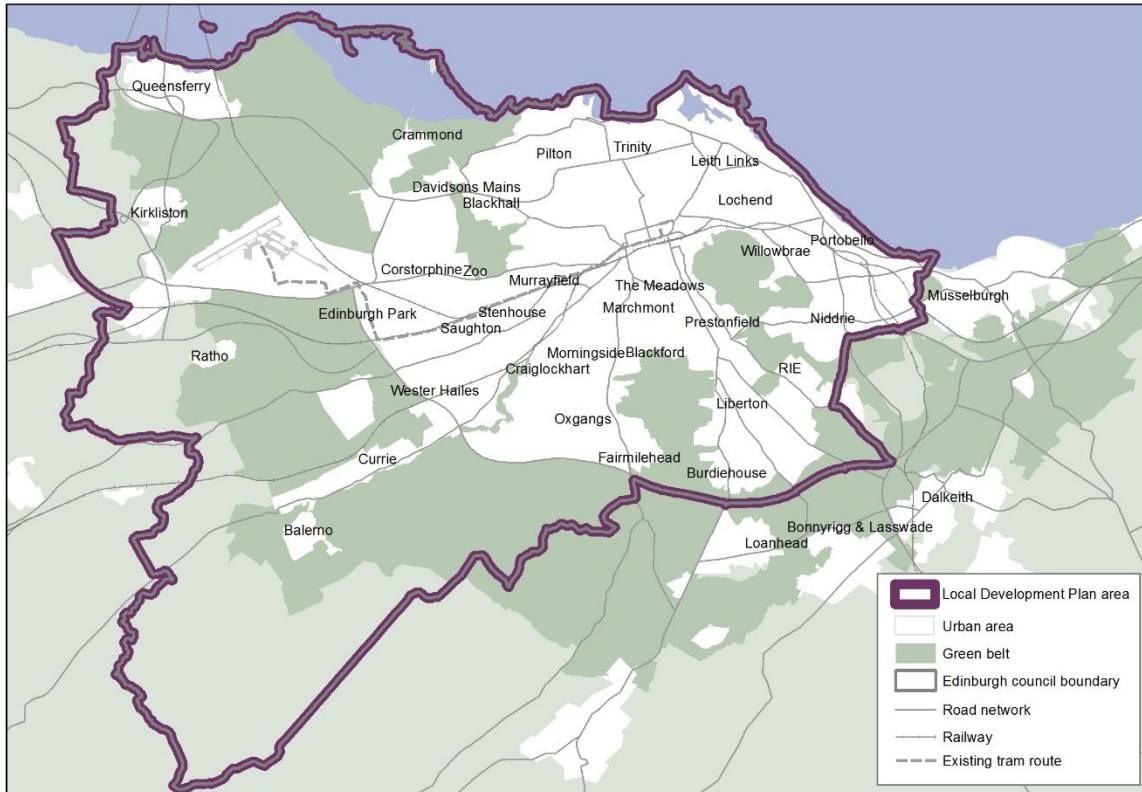
1.1 Purpose of this Statement

The City of Edinburgh Council adopted the City Plan 2030 on 7 November 2024. A statement is required under Part 3, Section 18 of the 2005 Strategic Environmental Assessment (Scotland) Act to set out how the consultation responses and the findings of the Environmental Report have been taken into account in the preparation of the Plan.

1.2 Key Facts

The key facts relating to the City Plan 2030 are set out below:

Name of Responsible Authority	The City of Edinburgh Council
Title of PPS	City Plan 2030
Requirement for the PPS	Legislative requirement
Subject of PPS	Land use planning
Period covered by PPS	10 years from date of adoption
Frequency of Update	At least every five years
Area covered by PPS	The City of Edinburgh Council Area (See Figure 1)
Purpose of the PPS	<ul style="list-style-type: none">• Set out a clear spatial strategy for the Council area• Allocate land to meet the needs and targets identified by the National Planning Framework and other material considerations• Provide a clear context and policy basis for development and for determining planning applications
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Figure 1: City of Edinburgh Council area, showing council boundary and LDP boundary

SEA activities to date

The process of environmental assessment of City Plan 2030 has been underway since the beginning of the development plan project. Table 1 sets out the Council’s SEA activities to date. Dialogue with the consultation authorities has been maintained throughout the project. The consultation authorities have provided valuable input on the methodology and content of the Environmental Report.

At the Main Issues Report (MIR), Choices for City Plan 2030, stage in 2020 the MIR issues and their reasonable alternatives were assessed and published in the first Environmental Report. This assessment was therefore available to read alongside the MIR and allowed the public to understand the environmental impact of the options at the MIR consultation stage.

A revised Environmental Report was prepared and published alongside the CP2030 Proposed Plan. This Environmental Report provided a summary of the assessment of the MIR options and identified which option was taken forward in the Proposed Plan, implications of this choice, noting any further action the Proposed Plan took including the options.

This Environmental Report was taken into account and referred to in the Council’s responses to issues raised in statutory representations. The Council’s responses were

set out in the summary of unresolved representations and can be found in the Report of Examination.

The Proposed Plan was submitted to Scottish Ministers in December 2022 for examination by the Directorate of Planning and Environmental Appeal reporters. The Report of Examination was published in April 2024 and recommended post-examination Modifications. In order to ensure the environmental impacts of the amended Plan were considered the modifications were reviewed using the same approach as the rest of the Plan, the result of which was reported to Committee alongside the modified Plan. It was concluded that none of the modifications put forward in the Report of Examination are likely to have significant environmental effects. Only two housing sites were recommended for deletion, and accordingly were removed from the SEA. Only one additional site was added, East of Millburn Tower (H96), which already had consent and therefore was exempt from the SEA process, i.e. the environmental effects have already been assessed as part of that consent process. Minor changes to the wording of various policies were not considered to have any significant environmental effects that necessitated a change to the assessment. As a result it was considered there was no need to consult on the changes to the Environmental Report. The second revision of the report was published in June 2024.

The findings of the Environmental Report second revision informed the decision to publish the Plan as modified, following the examination in June 2024. The relevant report to Planning Committee is [available](#).

Table 1: SEA Activities to date

SEA Activity	Date
Inception meeting with consultation authorities on the LDP project and timescales and discussion on initial draft of scoping report.	June 2018
Preparatory work on MIR topics and collation of baseline information for SEA	June -July 2018
Preparing of scoping report	July 2018
Submission of scoping report	July 2018
Consultation authority responses to scoping report	August 2018
Prepare environmental report and associated information	September 2018 – October 2019
Circulate draft MIR and Environmental Report to consultation authorities for comment	November 2019
Revise Environmental Report following responses	December 2019
Publication of Environmental Report	January 2020
Consultation on Environmental Report and MIR	January- April 2020
Consultation authority and other stakeholder responses to the Environmental Report	April 2020
Summarise responses to the Environmental Report	May 2020
Publish responses to the MIR and Environmental Report	August 2020

Re-assess options set out in the MIR and those received during the consultation period	August -December 2020
Update Environmental Report to accompany Proposed Plan	December 2020- September 2021
Formal publication of revised Environmental Report	September 2021
Publication of Report of Examination	April 2024
Update Environmental Report to take account of modifications to Proposed Plan set out in Report of Examination	May 2024
Environmental Report second revision informs approval of Plan as Modified following examination	June 2024
Adoption of City Plan 2030	November 2024

2. How environmental considerations in the Environmental Report and the consultation responses have been take into account in the City Plan 2030

In advance of the SEA assessment, an initial review of the possible environmental problems and issues was undertaken. The review set out how the problems affected each of the SEA topic areas and set out the implications for the CP2030. The problems affecting each SEA topic area were recorded in Table 3 in each edition of the Environment Report. This statement now reflects on how the identified issues were then integrated into the Plan, as set out in the rightmost column of Table 2 below.

Table 2: Identified Issues

Issue	Topic	Implications for Plan	Taken into account
1. Loss of prime agricultural land (PAL) through development	Population and human health Soil	Meeting development requirements may need release of PAL around Edinburgh and its transport corridors.	The strategy of CP2030 is to focus development of brownfield sites in the first instance. As a result all of the new housing sites identified in the Plan are brownfield sites or existing allocated sites that have been reallocated from business use to housing/mixed use. Only one new greenfield site, which is prime agricultural land, has been allocated as an extension to Newbridge Industrial Estate. Overall the strategy is likely to have a positive effect on soils by

			<p>minimising the allocation of greenfield sites. There are also a range of environmental policies which would help to support positive environmental effects.</p>
<p>2. Possible future decreases in air quality/need to encourage more sustainable forms of transport: There are 6 Air Quality Management Areas in Edinburgh. 1 new Air quality management area (Jan 2017) has been identified since the last LDP due to deterioration of air quality in Leith docks area (see Appendix 6).</p>	<p>Air and Climatic factors</p>	<p>Support City Mobility plan objectives, including minimising need to travel and distances travelled, ensuring new allocations are well connected to public transport and existing and proposed active travel infrastructure, identification of low emissions zone, provide a policy seeking mitigation of air quality impacts and emphasis on delivering brownfield land with low car ownership and good access to active travel and public transport.</p>	<p>The Plan's spatial strategy is seeking to deliver high density, low car ownership development within the urban area. It coordinates development with public transport investment, active travel and green networks. Most brownfield site allocations have good access to existing public transport services and active travel opportunities. Major development areas in West Edinburgh will have access to the tram network and a rail station. A master planned approach being progressed in west Edinburgh will help to ensure low car trips and high levels of active travel and public transport mode share, significantly reducing the risk of impacts on air quality. If there are increases in trip rates, this should be offset by measures to update vehicle fleets and the low emissions zone.</p>
<p>3. Need to adapt to predicted climate change and its potential impacts.</p>	<p>Air and Climate factors</p>	<p>Consider the effects of climate change throughout the plan area and for the whole period of the plan and the need for adaptation.</p>	<p>A strategic flood assessment was carried out as part of the process of preparing the Plan and informed the choice of sites allocated for development. The policy</p>

<p>Climate change is likely to result in increased frequency and magnitude of extreme weather events such as flooding, droughts and heatwaves.</p> <p>Climate change mitigation required through reducing emissions.</p>		<p>Need to identify main adaptation actions for the identified main climate risks e.g. for increased flooding and heatwaves the green and blue network that take into account climate change.</p> <p>Need to identify mitigation measures e.g. objectives for zero carbon and how this will be achieved.</p>	<p>requirements set out in the Plan, development briefs and masterplanning can help to address most of the impacts of climate change through appropriate analysis, layout and design.</p> <p>The focus on the redevelopment of brownfield sites provides the opportunity to improve existing sites and reduce flooding impacts by including appropriate mitigation into the design.</p>
<p>4. Need to protect and improve the water status of major waterbodies and avoidance of flood risk and areas which could contribute to increased flood risk.</p> <p>Climate change is likely to result in increased flooding from rivers, the sea, surface water and sewer flooding.</p> <p>Waste water and water supply</p>	<p>Water</p>	<p>Consider potential enhancements to major waterbodies where new allocations are proposed. Consider risk of flooding with regard to redevelopment of brownfield sites resulting in change of use exposing higher risk property to risk of flooding. Deliver improved attenuation as part of new developments.</p> <p>Should consider the effects of climate change and all sources of flooding, including where relevant coastal erosion impacts, on sites and cumulative impact of sites on flood risk.</p> <p>Consider requirements for strategic surface</p>	<p>The Plan sets out a range of environmental policies, place based policies with development principles, site requirements in Appendix 4, and site specific requirements for development briefs and master plans to be prepared.</p> <p>All of these requirements will help to drive and inform appropriate site design and layouts. They also require the inclusion of mitigation measures which will protect the status of waterbodies and help to prevent flooding from all sources not just on specific sites but within the wider area. In turn this will assist in mitigating the impacts of climate change.</p>

<p>infrastructure are going to be placed under increasing pressure due to planned growth and climate change potentially impacting the water environment.</p>		<p>water drainage and waste water infrastructure and impacts on water quality.</p> <p>Consider requirements for water supply infrastructure.</p> <p>Should be part of a multifunctioning green and blue network.</p>	
<p>5. Edinburgh has a rich cultural heritage with two World Heritage Sites, Scheduled Monuments, archaeological remains, listed buildings and conservation areas. Edinburgh is under significant development pressure particularly in the historic core. There is a need to protect the cultural heritage from the negative impacts of development e.g. setting of SM, loss of LBs, effect of pollutants, etc</p>	<p>Cultural Heritage</p>	<p>City Plan 2030 should support the protection and enhancement of the cultural heritage resource from the effects of new development. Potential impacts on listed buildings and other heritage assets in the city through the redevelopment of brownfield sites to accommodate mixed use development and new build office and other commercial development in order to meet future demand.</p>	<p>The Plan sets out a range of environmental policies which seek to protect Edinburgh’s cultural heritage from development pressures.</p> <p>Where the Plan’s strategy is promoting development on sites with listed buildings or other heritage assets, it sets out mitigation requirements through either; Place based policies with development principles, site specific requirements in Appendix 4, and site specific requirements for development briefs and master plans to be prepared.</p>
<p>6. Edinburgh has a unique landscape setting</p>	<p>Landscape</p>	<p>City Plan 2030 should support the overall protection of the landscape character of</p>	<p>The Plan sets out a range of environmental policies which seek to protect Edinburgh’s landscape</p>

<p>surrounded by hills and open countryside. It also has landscape features that are contained within the urban form such as Arthur’s Seat, Corstorphine, the Braid Hills etc. There is a need to protect these landscape features from inappropriate development both within and on the edge of the urban form.</p>		<p>areas as well as their visual quality. It will protect, where appropriate, designated areas from inappropriate development and ensure new developments are designed and sited to minimise landscape/visual impacts.</p> <p>In addition to visual quality, etc. impacts on landscape and access to enjoy them, e.g. beaches and coast line and river corridors, should be assessed and considered.</p>	<p>character and designated areas from development pressures.</p> <p>The strategy of CP2030 is to focus development on brownfield sites in the first instance. As a result all of the new housing sites identified in the Plan are brownfield sites or existing allocated sites that have been reallocated from business use to housing.</p> <p>Only one new greenfield site, which is prime agricultural land, has been allocated as an extension to Newbridge Industrial Estate.</p> <p>Overall the strategy is likely to have a positive effect on landscapes.</p>
<p>7. The social, economic and physical environmental conditions in Edinburgh are variable and therefore do not provide a consistent quality of environment adequate to ensure good standards of public health across all areas and communities.</p>	<p>Population and human health</p>	<p>City Plan 2030 should help create well designed and sustainable communities with good access to amenities, green spaces, services and active travel. In addition, it will continue to deliver affordable, safe, quality housing that meets all needs, improve air quality, and help provide equality of access to employment opportunities.</p> <p>Should also help create communities that are ready for climate change and are resilient to extremes of weather including floods, droughts and heatwaves.</p>	<p>The strategy of CP2030 is focussed on bringing forward housing led mixed use development on existing brownfield sites. Sites that are close to the existing population. The redevelopment of sites provides many advantages including; the opportunity to include more affordable housing, new commercial uses and rehoused existing uses within new development designed to meet the latest environmental standards, which will help to mitigate climate change.</p>

		Also are mitigating climate change by reducing emissions and are zero carbon.	Where the strategy is looking to bring forward new development sites i.e. West Edinburgh, a master plan approach is being taken which will require new development to meet the various aims of the strategy including a place based approach, infrastructure first, net zero etc.
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How opinions and the results of the consultation were taken into account

Consultation with the statutory consultation authorities and other interested parties is a key part in the process of undertaking a SEA. The consultation authorities and the Scottish Government SEA Gateway team also provided valuable advice and input on the methodology and content of the Environmental Report. A summary of the comments and responses to the Environmental Report was recorded in each successive revision of the Environmental Report. These comments provide the feedback loop to ensure that the assessment was valid. The consultation authorities’ comments and responses on the Main Issues (Choices for City Plan 2030) are found in Table 4: Summary of consultation comments and Council responses, in Appendix 1.

The majority of the comments received concerned the details of the SEA assessment and resulted in alterations being made to the assessment but had no impact on the Plan itself.

Comments on the MIR stage has led to various changes being made to the SEA assessment including; ensuring all proposals, allocations and options that did not have consent were subject to SEA. In addition, changes were made to ensure all the individual site assessments identified the environmental impacts of development and set out appropriate mitigation. The updated information on mitigation helped to inform the development principles for sites set out in the Proposed Plan and subsequent site briefs or master plans.

Comments on the Proposed Plan stage has led some further changes being made to the SEA assessment, in particular, adding a reference to embodied carbon where allocations involve redevelopment of a brownfield site, and amending the assessment to cover health and well-being more broadly.

Although some minor updates were made to the Environmental Report following publication of the Report of Examination, no changes were made to the SEA

assessment for the reasons set out above, and therefore no further consultation on the revised report was required.

3. The reasons for choosing the City Plan 2030 as adopted, in light of the other reasonable alternatives considered

The detailed description of the 'Framework for assessing the environmental effects' is set out on page 22 of the Environmental Report second revision. With regard to delivering new homes the strategy options set out in the MIR comprised three main options. A brownfield led strategy, a greenfield strategy and a blended approach. The final option set out in the Proposed Plan was a brownfield led strategy. There were various reasons for this strategy option being selected but from an environmental perspective this was considered to have the least impact.

Assessment of Policy

As anticipated in the MIR, a significant number of policies were rolled forward from the previous Edinburgh Local Development Plan (2016). National planning policy and National Planning Framework 4 (NPF4), and the Strategic Development Plan at the time which was subsequently superseded by the NPF4, limited the options for reasonable alternatives. The environmental objectives were well embedded in the CP2030 policies – mainly positive or no significant or likely effects were noted. The only negative environmental impacts identified were associated with the policies related to specific places. Some of these impacts could be mitigated, for example, through requirements set out in development briefs, but not all of them could be. This is the inevitable consequence of supporting development required to meet housing need requirements.

Overall though, the combination, accumulation and possible synergies of the effects of policies were considered more likely to result in net environmental improvements across the LDP area and over the LDP period.

Assessment of Proposals

The main focus for assessing reasonable alternatives to the policies/policy direction took place at the MIR stage of the CP2030 preparation process and the publication of the Environmental Report that accompanied the MIR. All alternatives were assessed in the SEA. The assessment of all site specific proposals, including housing sites, was set out in Appendices 4 and 5 of the ER. At each stage the ER proposed recommendations for mitigation and enhancement measures to prevent, reduce or offset the adverse environmental impacts and to enhance the positive effects that were predicted to arise from the implementation of the Plan.

The ER only assessed reasonable alternatives for sites included in the MIR stage. Only the sites included within the Proposed Plan were included in the revised ER. Those sites

that were promoted in representations were assessed in the context of preparing the Schedule four forms for the examination stage of the Plan.

Conclusion

By the final stage of the CP2030 process in June 2024, the reasonable alternatives available to the Council had reduced to a statutory duty to consider the modification recommendations in the Report of Examination and accept the modifications or not. Since the Reporter's findings are largely binding, the Council had only limited scope to decide not to include any of the recommended changes to policies and proposals.

There were no further significant negative impacts identified in any of the revisions or additions to policies and proposals, as recommended in the Report of Examination. This assessment was noted in the second revision of the Environmental Report. Since the modifications recommended in the Report of Examination did not raise any new or additional significant environmental effects, the assessment did not provide any statutory reasons for the Council not to accept the Reporter's recommendations.

4. Monitoring

Monitoring of the effects of the implementation of the plan on the SEA objectives is a key part of the SEA process. Part 3 Section 18 of the Environmental Assessment (Scotland) Act 2005 sets out the requirements for monitoring the implementation of the qualifying plans: *"monitor the significant environmental effects of the implementation of the plan; these may include arrangements which enable the authority to identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action."*

Earlier iterations of proposed monitoring indicators were included in the Environmental Report and subsequent revisions (see Table 6 in Environmental Report Second Revision), and therefore have been subject to scrutiny and commented on. The baseline data set out in the Environmental Report provides the basis on which any monitoring will be carried out. The effects of the Plan on the baseline data will be registered using the Council's Uniform system which records planning applications and the land use designations noted and categorised in GIS.

Regular monitoring takes place for all of the Plan topic including the following:

Action/Delivery programme: is reviewed and updated usually every year.

Development and Change – Including monitoring development management decisions.

Open Space Strategy – regular review of the open space strategy enables review of the loss of open space through development management decisions.

Vacant and derelict land (V&DL) – An annual survey is carried out of the numbers and locations of derelict land sites and the level of take up over the previous year. Information is also gathered about the preferred end use for each site and its condition. This information is sent to the Scottish Government for their national monitoring purposes.

Housing land Supply Audit: Monitors the level of housing completions and updates the supply and programming of established and effective sites.

Employment Land Audit: Measures the availability and take up of industrial land by type and location.

Economic trends: monitoring changes through the Commercial Needs Study.

Retail Monitoring: monitoring the performance, vitality and viability, of all town and local, and neighbourhood centres through a periodic city wide retail survey (the intention is to carry it out every 5 years) and regular review of the city and town centres (every year).

Environmental data: actively ongoing monitoring e.g. city-wide habitat surveys, flood risk monitoring, open space audit, place efficiency assessment, air quality emissions etc.

It is intended that a series of monitoring analysis on a range of subjects covered in the Local Development Plan will be carried out regularly, and in particular through the Evidence Report process for the next local development plan. This will offer an indication as to the effectiveness of the Plan and the extent to which it is being appropriately implemented on the ground. This is especially important due to the fact that the true impact of many of the policies will be determined by how they are implemented through Development Management decisions. The results of monitoring will also be used to inform the review of the policies and proposals to be included in City Plan 2040.

Table 3: Proposed Monitoring Indicators

Proposed Monitoring Indicators		
Environmental Objective	Indicators	Data Sources
Biodiversity <i>Protect and enhance biodiversity, flora and fauna, and habitat networks</i>	Number of planning applications for development on, or overlapping a nature conservation site approved/refused (<i>Focusing mainly on major housing and commercial developments</i>).	GIS/Uniform
Population and Human Health	Number of planning applications with “good”	Uniform and accessibility modelling

<p><i>Improve the quality of life and human health for communities</i></p>	<p>accessibility to convenience or healthcare facilities.</p> <p>Number of new housing units approved with “good” accessibility to good bus, train or tram services.</p> <p>Population with good accessibility to open space.</p>	<p>Uniform and accessibility data</p> <p>GIS</p>
<p>Soil <i>Protect the quality of soil</i></p>	<p>Area of remediated brownfield sites as a result of development.</p> <p>Area of prime agricultural land lost from development (planning applications granted/refused) <i>May have to be restricted to housing and large commercial developments</i></p>	<p>HLA and Vacant & Derelict Land Survey.</p> <p>GIS/Uniform</p>
<p>Water <i>Prevent the deterioration and, where possible, enhance the status of the water environment and reduce/ manage flood risk in a sustainable way</i></p>	<p>Number of new housing units/area approved and refused within area designated as a functional flood plain. <i>May have to restrict to housing and large commercial development.</i></p> <p>Number of SUDS features by type in new development (e.g. underground, over-ground or permeable paving).</p> <p>Improvements to water quality and ecological status of water courses.</p>	<p>Uniform and GIS</p> <p>Uniform/GIS/Scottish Water: no current data source</p> <p>SEPA and River Basin Management Plan</p>
<p>Air and Climate <i>Maintain and improve air quality, and reduce the causes and effects of climate change</i></p>	<p>Number and changes to existing Air Quality Management Areas (AQMA)</p>	<p>GIS</p> <p>Evidence from annual air quality monitoring report</p>
<p>Material Assets</p>	<p>Number of applications for waste management facilities.</p>	<p>GIS</p>

<i>Minimise waste and promote the sustainable use of natural resources and material assets.</i>		
Cultural Heritage <i>Protect and, where appropriate/feasible enhance the historic environment</i>	<p>Number of applications approved where adverse effects on the historic environment were anticipated.</p> <p>Number of applications refused or withdrawn due to adverse impacts on the historic environment.</p> <p>Number of listed buildings on “At Risk” register.</p> <p>Number of scheduled monuments assessed as being in unsatisfactory condition or with extensive significant problems</p>	<p>Uniform</p> <p>Uniform</p> <p>Buildings at Risk Register</p> <p>Scottish Historic Environment Audit</p>
Landscape and Townscape <i>Protect and enhance the landscape character and setting of the city and improve access to the open space network</i>	<p>Areas of Green Belt and Special Landscape Areas land lost to/protected from development (i.e. planning applications granted/refused) <i>May have to be restricted to housing and large commercial developments.</i></p> <p>Area of open space lost to/protected from development (i.e. number of applications granted/refused).</p> <p>Area of open space, parks and woodland delivered from allocations in the Proposed Plan.</p> <p>Number of applications approved that would impact on the city skyline and key views.</p>	<p>GIS and Uniform reports with reference to the Open Space Strategy.</p> <p>Uniform / Open Space Audit</p> <p>Uniform/ Open Space Audit</p> <p>Uniform</p>

Conclusion

It is our view that the SEA has had a positive effect on the preparation of City Plan 2030. The SEA clearly identifies environmental effects of policies and proposals and potential mitigation measures.

The SEA process has resulted in new policies and the rewording/strengthening of existing policies within the Plan.

Appendix 1

Table 4: Summary of Comments on City Plan 2030 MIR Environmental Report

Text in **green** was prepared at the MIR stage, and text in **blue** was prepared at the proposed plan stage.

Organisation	Issue/Comment	Implications
HES	The reference to HES Policy 2016 should be replaced with the Historic Environment Policy for Scotland (HEPS), which was adopted in 2019.	Reference in report updated.
HES	Choice 1 Making Edinburgh a sustainable, active and connected city: Options F (new allotments) and G (new cemeteries) would introduce new spatial allocations. The development types proposed have potential to affect historic environmental assets and any allocations should be subject to environmental assessment which should inform site selection.	Updated assessment includes all spatial allocations.
HES	Choice 2 Improving quality, density and accessibility of development. The assessment of this choice does not provide any commentary to explain why it is considered there will be no significant effects for the historic environment, i.e. increased densities could have negative effects on historic environments. These effects can be mitigated through relevant policies, place briefs and careful consideration of the historic environment when designating higher density sites.	Assessment updated
HES	Choice 5 Delivering Community Infrastructure. It is not clear if the proposed plan will set out spatial framework/allocations for the types of infrastructure development in options A-E. If so there should be subject to environmental assessment which should inform which sites are selected to go forward into the proposed plan and be reported in the ER.	Updated assessment includes all community infrastructure allocations that do not have consent.
HES	Choice 7 Supporting Reduction in Car Use. Option D appears to introduce the allocation of new safeguarded sites for Park and Ride facilities. Not clear if the selection of these sites has been subject to environmental assessment through another related PPS. If so should include summary of that assessment. If not this should form part of decision making process.	Updated assessment includes all transport allocations that do not have consent.
HES	Choice 16 Delivering Office, Business and Industry Floorspace. Proposes to set a specific spatial framework/allocations for the types of development covered by option B (identify sites/locations within Edinburgh with potential for	The Proposed Plan has not identified any specific sites for office development. Sites already identified in

	office development) and E (Identify proposals for business/industrial sites at; Leith Docks, Newbridge, Newcraighall Industrial Estate, Crosswinds runway). Several of these are identified spatially within the MIR. It is unclear why there has not been a site specific assessment. Any specific sites which are brought forward in the Proposed Plan should be subject to SEA which informs which sites are selected to go forward and included in the ER.	previous LDP which already have consent form part of the baseline and cumulative assessment.
HES	Choice 12 Building new homes and Infrastructure. Comments on site effects are restricted to a basic statement on the baseline and mitigation relies on generic policy requirements rather than site specific measures. Therefore it is difficult to ascertain how effective mitigation might be. Strongly supportive of place briefs for all site allocations which will offer a framework for ensuring mitigation/enhancement measures are delivered effectively. The findings of the SEA should form the basis of any place brief, however, the generic nature of the assessment/mitigation provided will limit the scope of the interaction between them. Recommend emerging Proposed Plan is informed by a second stage of assessment that explores the nature of likely effects and site specific mitigation required, and the residual effects post-mitigation.	Noted. Site assessments have been updated with more detailed information and place briefs prepared to mitigate impacts where required.
HES	The SEA mitigation provided for non-designated heritage assets is that decision makers should 'consider preserving and enhancing the assets, within an appropriate setting'. You should consider whether this adequately reflects national policy on non-designated historic environment assets, which seeks protection and preservation as far as possible, in situ where possible (SPP paragraphs 150 and 151).	Report updated.
HES	In the case of several brownfield sites the SEA has not captured the potential of positive effects, e.g. where a site is within a Conservation Area removal of a negative building and replacement with something more in keeping, or re-use of an unused historic building. This limits ability to fully inform place briefs.	Some positive benefits are recognised. However, the emphasis of the SEA is on highlighting the significant impacts and in particular the sensitivity of relevant sites to existing conservation areas/listed buildings to ensure new development is appropriately designed

		to prevent negative impacts.
HES	Existing sites carried forward into the Proposed Plan should be taken into account in the ER, either cumulatively and individually as appropriate.	Noted. Updated assessment includes all spatial allocations. Sites already identified in previous LDP which already have consent form part of the baseline and cumulative assessment.
HES	Some individual site assessment have not fully identified the historic environment baseline.	Site assessments have been updated.
HES	Welcome cumulative assessment of sites at this stage. As Proposed Plan develops it will be important to assess the cumulative effects of different site combinations, including rolled forward sites, in order to inform decision making on which sites are brought forward. This should be reported in the ER.	Noted. The site assessment and cumulative assessment have been updated to assess the combination of sites.
HES	Site 7, West Bowling Green Street. Assessment identifies listed building within site, but none shown on records.	Assessment updated.
HES	Site 38, Dumbryden Drive. Part of site within conservation area but not identified.	The site is not within a conservation area.
HES	Site 43, Stenhouse Road. Effects on setting of A listed building Stenhouse Mill recorded as uncertain but no explanation. There is potential for significant negative effects without mitigation but also potential for positive effects if enhancement measures identified	The site is not allocated within the proposed plan.
HES	Site 88, Temple Park Crescent. Location of site adjacent to SM Union Canal, not identified or assessed for effects/mitigation/enhancement.	Assessment updated.
HES	Site 89, Watson Crescent Land. Location of site adjacent to SM Union Canal, not identified or assessed for effects/mitigation/enhancement.	Assessment updated.
HES	Site 134, South Fort Street. Does not fully identify non-designated historic environment, particularly the streetscape, for instance the cobbled street or street furniture (lamp standard).	Assessment updated.
HES	Site 147, McDonald Road (A). B listed building occupies site. Potential for significant positive effect from sensitive re-use of building at risk not identified.	The site is not allocated within the proposed plan.
HES	Site 158 Pitt Street. H1, H2 and H3 effects identified but not relevant, non-designated elements such as gable sculptures, industrial	Assessment updated.

	buildings, streetscape e.g. cobbles) should be identified.	
HES	Site 161, Leith Walk (depot). Baseline incorrect. H1, and H3 effects identified but not accurate (C listed LB and part of CA within site, not adjacent), Incorrect H6 sig effects and mitigation identified (depot demolished, site cleared)	Assessment updated.
HES	Site 188, Rae's Crescent. Potential for setting effects on B listed building (LB23121); not identified or assessed for effects and mitigation / enhancement	Assessment updated.
HES	Site 191, Craiglockhard Avenue. Potential for setting effects on SM 11097 Union Canal Fountainbridge to River Almond; not identified or assessed for effects and mitigation / enhancement.	Assessment updated.
HES	Site 192, Inglis Green Road. Potential for effects on non-designated historic building at 30 Inglis Green Road; not identified or assessed for effects and mitigation / enhancement	The site is not allocated within the proposed plan.
HES	Site 266, Niddrie Mains Road (A). incorrectly identifies H1 and H6 effects. Site appears to be totally cleared.	The site is not allocated within the proposed plan.
HES	Site 289, Liberton Hospital. Presence on site of non-designated HE asset Liberton Hospital; not identified or assessed for effects and mitigation / enhancement.	Assessment updated
HES	Site 335, Portobello Road. effects for H1 (setting of C listed buildings); not identified or assessed for effects and mitigation / enhancement.	Assessment updated
HES	Site 345, Corstorphine Road (A). C listed LB44761 (also a Building at Risk) on site but not identified or assessed for effects and mitigation / enhancement.	Assessment updated
HES	Site 369, Murrumburn Road. SM Union Canal partially within site. Potential for direct and setting effects not identified or assessed for effects and mitigation/enhancement.	Site is not allocated within the proposed plan.
HES	Site 372, Inch Nursery. B listed LB28080 Sundial on site, A listed LB28078 Inch House adjacent; not identified or assessed for effects and mitigation / enhancement	Site is not allocated within the proposed plan.
HES	Site 379, Lanark Road (D). Non-designated HE asset (telephone exchange building) on site; not identified or assessed for effects and mitigation / enhancement.	Assessment updated

HES	Site 382, Steads Place. Identifies site as being adjacent to Conservation Area, when partially within.	Assessment updated
HES	Site 386, Commercial Street. Adjacent to SM2993 Citadel Arch; not identified or assessed for effects and mitigation / enhancement.	Assessment updated
HES	Site 399, Broughton Market. Several non-designated HE assets (including streetscape) not identified or assessed for effects and mitigation / enhancement.	Assessment updated
HES	Site 404, East London Street. In vicinity of LB 29263 Gayfield House; not identified or assessed for effects and mitigation / enhancement	Assessment updated
HES	Site Craighrae. In vicinity of Carlowrie House LB26879; not identified or assessed for effects and mitigation / enhancement.	Site has not been allocated in the Proposed Plan.
HES	Site Conifox. Incorrect effects for H1 identified. In vicinity of Carlowrie House LB26879; not identified or assessed for effects and mitigation / enhancement.	Site has not been allocated in the Proposed Plan.
NatureScot	Significant areas of vacant and derelict land should be considered in relation to other significant changes such as the redevelopment of Seafield. Relocation of existing businesses should consider these sites eg Newbridge which may be more suited for business uses.	Noted. This land was taken into account in the brownfield housing site assessment process. However, there is very little vacant or derelict land available anymore in Edinburgh for relocation of businesses.
NatureScot	Choice 2 Improving the quality, density and accessibility of development. We generally agree with principle of higher density development but this won't reduce travel unless delivered alongside places of work, shopping and social activity, improved public transport and active travel. Proposed Plan should be directed by this positive effect and what is required to achieve it.	Noted. The CP2030 proposes a mixed-use housing led approach rather than identify sites specifically for housing. Place briefs have been prepared for sites to identify infrastructure requirements such as public transport and active travel.
NatureScot	Choice 7 Supporting the reduction in car use in Edinburgh. Unclear that " <i>protect against development of additional parking in the city</i> "	The Council has approved the reallocation of parking

	<p>centre" is achievable when there are competing and conflicting proposals proceeding through Traffic Regulation Orders proposing creation of new through TROs. We understand that these changes were approved at the Transport and Environment Committee on 27 February. We agree with the predicted positive effect of Choice but consider it will be undermined by these actions.</p>	<p>spaces for shared use as a means of improving flexibility. The CP2030 seeks to address the impacts of development and does not extend to detailed management of parking spaces under other legislative controls. However, the Council has prepared the City Mobility Plan in parallel to the CP2030 to try to avoid inconsistencies in its policies and proposals.</p>
NatureScot	<p>Cumulative effects on population and human health focuses on impacts of developing in areas that already experience poor air quality. Too restrictive, health is affected by other factors eg development that leads to reliance on private car with lower levels of physical activity, in addition to access to open space etc.</p>	<p>Report updated.</p>
NatureScot	<p>Cumulative impact of development in SE Edinburgh balanced by retention of existing landscape character to south of A720. However, unclear that proposed balancing measure can be relied on as it includes land in Midlothian subject to development pressure.</p>	<p>Noted. The proposed Plan does not allocated land in South East Edinburgh.</p>
NatureScot	<p>Choice 1 Making Edinburgh a sustainable, active and connected city. Agree with assessment of preferred option but unclear as to why there would not be a positive effect for encourage the use of core paths, pedestrian walkways and cycle tracks</p>	<p>Assessment updated to include the positive effects.</p>
NatureScot	<p>Choice 2 Improving the quality, density and accessibility of development. We query whether the Preferred and Alternative Options both have neutral effect on Biodiversity, Flora and Fauna. Continuing using the current policy on density would lead to more extensive development which in itself is more likely to adversely affect habitats, species and habitat networks.</p>	<p>Assessment updated to show that the preferred option will have a positive effect on biodiversity, flora and fauna by minimising the amount of greenfield land required for development.</p>
NatureScot	<p>Choice 4 Creating Place Briefs and supporting the use of Local Place Plans in our communities. Supportive of place briefs and consider they would have a number of benefits over the current</p>	<p>Noted.</p>

	approach including biodiversity, population and landscape.	
NatureScot	Choice 6 Creating places that focus on people, not cars. Unclear why this Choice isn't assessed as having a positive effect on Material Assets M1 as changes identified in the Preferred Option would contribute towards protection and enhancement of open space as part of a green active travel network.	Assessment updated to make reference to the positive effects.
NatureScot	Choice 12 Building our new homes and infrastructure. Assessment of Alternative Option 1 and 2 for Biodiversity, Flora and Fauna needs to be reconsidered as both blended and greenfield approaches could have significant effect on this Topic. At the very least, the effect would be uncertain until sites are chosen. We consider that Landscape assessment is perhaps inaccurate for the Preferred Option as some sites such as Seafield could lead to positive effects if redeveloped in an appropriate manner.	<p>Choices assessment updated to make reference to the unknown effects on biodiversity, flora and fauna of the reasonable alternatives as it was uncertain at that time which sites would be brought forward.</p> <p>The updated site assessment looks at the impact of sites on protected viewcones across Edinburgh which influences the landscape assessment results. Whilst the site may have positive effects on local landscape it may have negative effects in the city context.</p>
NatureScot	Choice 14 Delivering West Edinburgh. While the RHS allocation is an existing safeguard it is not brownfield and should not be assessed on that basis as part of the Preferred Option set out in Choice 12.	Reference to brownfield site assessment applies to the Crosswinds runway site not the Norton Park site which is considered a greenfield site.
NatureScot	<p>The assessments of the potential allocations at East of Riccarton, Kirkliston and Calderwood note that they are distant from the other greenfield sites and so would not have a cumulative effect with them.</p> <p>That is a reasonable assessment but there does not appear to be consideration of impact in combination with existing development and therefore these sites should be reviewed.</p>	These sites have not been included within the Proposed Plan.

NatureScot	Query the overall negative effect identified for soils. The cumulative loss of prime agricultural land across authorities would be an overall negative effect due to the irreplaceable nature of this resource.	Report updated.
NatureScot	Site 383 Seafield. We consider that this potential allocation raises issues of a strategic nature which if properly identified and set out in an area wide development framework could lead to protection or enhancement of the natural heritage. Our comments on this site highlight issues and opportunities that should be set out in the requirements for detailed design and consideration of natural heritage issues through individual site briefs and masterplans.	Noted. A site brief has been prepared for this site that identifies the strategic issues of concern and the mitigation required to address these issues.
NatureScot	Site 334 Westbank Street. We recommend that a site brief is produced to identify the key natural heritage assets of the site and the key opportunities for the integration of green infrastructure within future development. Our comments on this site highlight issues and opportunities that should be set out in the brief.	Noted. This site has not been allocated within the Proposed Plan.
NatureScot	Site 259 Astley Ainslie Hospital. We recommend that a site brief is produced to identify the key natural heritage assets of the site and the key opportunities for the integration of green infrastructure within future development. Our comments on this site highlight issues and opportunities that should be set out in the brief.	Noted. The assessment has been updated. A site brief has been prepared for this site which addresses these issues.
NatureScot	Site 367, Redford Barracks. We recommend that a site brief is produced to identify the key natural heritage assets of the site and the key opportunities for the integration of green infrastructure within future development. Our comments on this site highlight issues and opportunities that should be set out in the brief.	Noted. A site brief has been prepared for this site which addresses these issues. In addition, a place brief will also be prepared for this site which will become non-statutory planning guidance.
NatureScot	Site 281, Turnhouse Road. We consider that this potential allocation (along with sites 282, 406 and existing adjacent permissions) raises issues of a strategic nature which if properly identified and set out in an area wide development framework could lead to protection or enhancement of the natural heritage. Our comments on this site highlight issues and opportunities that should be set out in the requirements for detailed design and consideration of natural heritage issues through individual site briefs and masterplans.	Noted. Site briefs have been prepared for these sites which addresses these issues.

NatureScot	<p>Site 282, Turnhouse Road.</p> <p>We consider that this potential allocation (along with sites 281, 406 and existing adjacent permissions) raises issues of a strategic nature which if properly identified and set out in an area wide development framework could lead to protection or enhancement of the natural heritage. Our comments on this site highlight issues and opportunities that should be set out in the requirements for detailed design and consideration of natural heritage issues through individual site briefs and masterplans.</p>	<p>Noted. Development in West Edinburgh will have to accord with the West Edinburgh Development Principles.</p>
NatureScot	<p>Site 406, Crosswinds.</p> <p>We consider that this potential allocation (along with sites 281, 282 and existing adjacent permissions) raises issues of a strategic nature which if properly identified and set out in an area wide development framework could lead to protection or enhancement of the natural heritage. Our comments on this site highlight issues and opportunities that should be set out in the requirements for detailed design and consideration of natural heritage issues through individual site briefs and masterplans.</p>	<p>Noted. Development in West Edinburgh will have to accord with the West Edinburgh Development Principles.</p>
NatureScot	<p>Site 225, Eastfield Road</p> <p>We recommend that a site brief is produced to identify the key natural heritage assets of the site and the key opportunities for the integration of green infrastructure within future development. Our comments on this site highlight issues and opportunities that should be set out in the brief.</p>	<p>Noted. Assessment has been updated with reference to SPA and HRA. Development will have to accord with development principles set out in the plan.</p>
NatureScot	<p>Greenfield Site, South East Edinburgh. If required to help deliver housing numbers, we note that allocation of sites in this location could help to assist with delivery of the Edinburgh City Orbital active travel and public transport route, as agreed during preparation of SESplan. There are a number of constraints and opportunities in this area, including a requirement for a robust landscape framework, and we emphasise that in addressing these further constraints for delivery of the City Orbital should not be introduced.</p>	<p>Site has not been allocated in Proposed Plan.</p>
NatureScot	<p>Greenfield Site, West Edinburgh. The main site, which occupies Easter and Middle Norton is largely flat with few existing features that could influence design or be retained in development. However, we note that some boundaries have tree</p>	<p>Site has not been allocated in the Proposed Plan.</p>

	<p>/ hedgerows which should be retained / enhanced if this site is allocated. Strongly recommend that routes within the site linked to existing and proposed active travel and public transport networks. Noise attenuation would be required to address the rail line and the M8. Screening from the A8 would be beneficial but not at the expense of integrating the road and development at place. The other small site rises more towards the south. If allocated the existing roadside planting along the A8 should be retained and enhanced. The railway would also require attenuation. Both sites are distance from existing town centres and therefore should be strong focus on creation of liveable neighbourhoods supported by local centres and green networks.</p>	
NatureScot	<p>Greenfield Site, Kirkliston. Sites around Almondhill, Almondhill Cottages and Foxhall could make a minor logical extension to Kirkliston. These sites are close to the existing town centres but existing facilities may not be sufficient to serve the extended settlement. The large northern site which lies between Almondhill and Carlowrie Cottages would represent a significant extension to Kirkliston, further reducing its separation from Dalmeny and South Queensferry. This site is more distant to the town centre and therefore if allocated we advise that a local centre, with direct legible walking and cycling links within the site and to the recent extensions on the east side of Kirkliston, should be a requirement of any allocation. Links to the nearby Dalmeny /Newbridge railway path should also be made from this allocation.</p>	<p>Site has not been allocated in the Proposed Plan.</p>
NatureScot	<p>Greenfield Site, East of Riccarton. Site is distant from existing town centres (Currie/Wester Hailes), both separated by strategic transport infrastructure. If required should be strong focus on creation of liveable neighbourhoods supported by local centres and multi functional green networks.</p>	<p>Site has not been allocated in the Proposed Plan.</p>
NatureScot	<p>Greenfield Site, Calderwood. This site appears in part to be a logical extension to the current Calderwood development in West Lothian. If required to help deliver required housing numbers, a limited allocation here would benefit from proximity to Calderwood town centre and we recommend that planned density should reflect this proximity. We do however query the eastward extension along the Cliftonhall Road to West Clifton. There</p>	<p>Site has not been allocated in the Proposed Plan.</p>

	is a partial field boundary running east-west here but otherwise no clear, robust boundaries at present. This part of the site may also lead to future allocations or proposals, introducing further development into this largely rural area with further loss of the green belt in an area that is currently underserved for both active travel and sustainable transport.	
NatureScot	Maps. We are unclear on what is meant by 'Potential Greenfield' in keys for maps on pages 197 and 198. These correlate with some of the potential greenfield allocations but others are missing and others not part of assessment are included, e.g. site to west of Riccarton/Heriot-Watt.	Noted. Map has been updated in report.
SEPA	Recommend a strategic flood risk assessment is carried out to support the next stages of the Edinburgh LDP to inform how Edinburgh can adapt to climate change and ensure new development does not increase flood risk now and in the future.	Noted. The Council commissioned consultants to prepare a strategic flood risk assessment. The results of the assessment have been incorporated into the SEA.
SEPA	To inform the LDP and strategic planning of flood risk management, SEPA and partners in CEC and Scottish Water need to bring together our different ways of mapping flood risk and different types of flooding, water catchments, water bodies, flow paths, etc. to have a joined up and holistic understanding of flood risk in and around the city to be used to inform the identification of sites appropriate for development and the strategic interventions needed to avoid increased flood risk.	Noted. CEC and partners worked together to bring different map data together in the context of the strategic flood risk assessment.
SEPA	Edinburgh's waste water and water supply infrastructure will be placed under pressure by climate change and scale of development. SEPA will continue to support Edinburgh Council and Scottish Water to determine how impacts can be mitigated, in particular essential strategic approach to surface water drainage is taken to reduce impacts on sewer network and reduce risk of surface water flooding.	Noted.
SEPA	SEPA fully supports and endorses the holistic way the plans for the City are being developed in parallel, reinforcing each other, providing the opportunity to identify cumulative or in-combination effects at the earliest stage along with the opportunity to identify how these effects can best be remedied (or benefits maximised) across a range of initiatives.	Noted.

SEPA	SEPA agree dealing with poor air quality is a priority to be addressed in Edinburgh and is an important reason for a holistic approach to the development of the City Plan, the ECCT, the CMP and the Low Emissions Zone. One of the prime aims of these plans is to ensure improvement in air quality.	Noted
SEPA	Recommend a Strategic Flood Risk Assessment is carried out to determine areas of importance for flood management that also includes most up to date information on climate change. UK climate projections 2018 improves our understanding of the impacts of climate change for sea level rise, river flows, and rainfall intensity. Current SEPA flood maps are not suitable for this purpose. The assessment should inform other aspects of the plan, in particular, multifunctional green and blue network, locations of new development and its impact on flooding, inform strategic drainage requirements and work with Scottish Water.	Noted. CEC and partners worked together to bring different map data together in the context of the strategic flood risk assessment.
SEPA	Risk of flooding from the sea and sewers must be taken into account. Current risk of flooding and future risk due to climate change must be considered. Recommend that a Strategic Flood Risk Assessment is carried out to inform this. Sewer flooding should also be taken into account alongside Scottish Water's position of no longer accepting Surface Water from new development into the combined sewer.	Noted. CEC and partners worked together to bring different map data together in the context of the strategic flood risk assessment.
SEPA	Excluding surface water from combined sewers provides opportunities, e.g. green and blue infrastructure.	Noted.
SEPA	Impact of new development and climate change on water quality should also be assessed.	Noted. Water quality issues are associated with sewer flooding and lack of appropriate sustainable urban drainage being used on site. Scottish Water have provided data on sewer flooding which is being considered by looking at specific projects that will be promoted through the Greenblue network project and have been involved in the preparation of the SFRA. Updated policy will drive forward more

		favourable SUDS options which will allow better control on water quality issues.
SEPA	Edinburgh's waste water infrastructure will be placed under pressure due to development and climate change and could result in increased sewer flooding. SEPA will work with CEC and Scottish Water on how these impacts can be mitigated.	Noted.
SEPA	Taking water out of the sewer with blue/green infrastructure would help deliver safer bathing at Fisherrow and Portobello.	Noted. These issues will be taken into account in the green blue network project when looking for opportunities to make improvements in the water environment.
SEPA	Increased demand and climate change will put pressure on water supply to Edinburgh and its surrounding regions. Recommend SW is consulted on the resilience of the water supply	Noted. Scottish Water assesses the resilience of public water supplies using a 25 year demand projection. SW's view is that Edinburgh's water supply is currently drought resilient, but the combined pressure of forecast population growth and climate change may require SW intervention to ensure adequate supplies are available in the future. However, SW is confident that the projected growth identified within the Edinburgh City Plan to 2030 can be accommodated.
SEPA	Quality of water environment under pressure from growth and climate change. The scale of development may impact on access to the water environment for people to enjoy e.g. development could reduce access to river corridors.	Report updated with reference in Table 3.
SEPA	Table 3 Environmental Issues. Add following text:	Report updated.

	<p>Issue 3; <i>“Should highlight the main climate risks facing Edinburgh for example:</i></p> <p><i>Climate change is likely to result in increased frequency and magnitude of extreme weather events such as flooding, droughts and heatwaves.</i></p> <p><i>Should highlight climate change mitigation here also and reducing emissions.”</i></p> <p>Implications for Plan; <i>“Should highlight the main adaptation actions for the identified main climate risks e.g. for increased flooding and heatwaves the green and blue network that takes into account climate change.</i></p> <p><i>Should highlight mitigation here? E.g. goals for zero carbon and how this will be achieved?</i></p>	
SEPA	<p>Table 3 Environmental Issues. Add following text.</p> <p>Issue 4; <i>“Should highlight that climate change is likely to result in increased flooding from rivers, the sea, surface water and sewer flooding.</i></p> <p><i>Waste water and water supply infrastructure are going to be placed under increasing pressure due to planned growth and climate change potentially impacting the water environment.”</i></p> <p>Implications for Plan; <i>“Should consider the effects of climate change and flooding for all sites and cumulative impact of sites on flood risk.</i></p> <p><i>Consider requirements for strategic surface water drainage and waste water infrastructure and impacts on water quality.</i></p> <p><i>Consider requirements for water supply infrastructure.</i></p> <p><i>Should be part of multifunctional green and blue network.</i></p> <p><i>Strategic flood risk assessment required to inform”</i></p>	Report updated.
SEPA	<p>Table 3 Environmental Issues. Add following text.</p> <p>Issue 6, Implications for plan; <i>“In addition to visual quality, etc. impacts on landscape and access to enjoy them, e.g. beaches and coast line and river corridors, should be assessed and considered.”</i></p>	Report updated
SEPA	<p>Table 3 Environmental Issues. Add following text.</p>	Report updated

	<p>Issue 7, Implications for plan; “<i>Should add create communities that are ready for climate change and are resilient to extremes of weather including floods, droughts and heatwaves.</i></p> <p><i>And are mitigating climate change by reducing emissions and are zero carbon.</i>”</p>	
SEPA	Endorse the approach taken to new sites addressing the cumulative effects both internally and externally to Edinburgh.	Noted
SEPA	<p>Support methodology for assessing choices. Other questions and criteria are linked to these issues, e.g. preventing soil sealing maintains soil for growing food but also ensures the soil can absorb and filter rain/surface water reducing flood risk. Consideration of climate change should be included, e.g. would the choice minimise flood risk now and in the future.</p> <p>Under landscape and townscape there should be an assessment on access.</p>	<p>Report updated to make reference to “both now and in the future” under flood risk.</p> <p>Noted. Question added to methodology on access.</p>
SEPA	<p>Table 5, Methodology for Assessing Sites. Air and climatic factors should include an assessment of climate change mitigation and reducing CO2 emissions to achieve zero carbon.</p> <p>To address the impact of flood risk including climate change adequately on both individual sites and cumulatively, SEPA recommends a strategic flood risk assessment is carried out. The current SEPA maps are not suitable for this.</p>	<p>Noted. The environmental impacts of new sites on emissions and air quality has been assessed through the Transport Assessment. The results of that Assessment are included within the finalised Environmental Report.</p> <p>Noted. The Council commissioned consultants to prepare a strategic flood risk assessment. The results of the assessment have been incorporated into the ER.</p>
SEPA	<p>Brownfield sites. Agree that there is potential for improving elements of the environment. Connecting brownfield sites to a more strategic green and blue network has multiple benefits but may be more challenging than greenfield sites but SEPA will work with CEC and SW to support this. The strategic flood risk assessment will help support;</p>	Noted. The consultants commissioned to prepare the strategic flood risk assessment are also preparing the strategic green blue network project enabling the two

	<ul style="list-style-type: none"> • Planning and implementation of a multifunctioning green and blue network • Informing locations for new development and where new development may have a cumulative impact on flooding, • Informing strategic drainage requirements and work with SW including identification of small urban watercourses that are at risk of flooding and where might be cumulative surface water discharges into these small watercourses and what mitigation can be taken. 	matters to inform each other.
SEPA	<p>Greenfield sites. Support approach to assessing these sites. Recommend a strategic flood risk assessment will help support;</p> <ul style="list-style-type: none"> • Planning and implementation of a multifunctioning green and blue network • Informing locations for new development and where new development may have a cumulative impact on flooding, • Informing strategic drainage requirements and work with SW including identification of small urban watercourses that are at risk of flooding and where might be cumulative surface water discharges into these small watercourses and what mitigation can be taken. 	Noted. The consultants commissioned to prepare the strategic flood risk assessment are also preparing the strategic green blue network project enabling the two matters to inform each other.
SEPA	SEA Choices Assessment. Support and endorse assessment criteria, how its applied and the outcomes. Seek clarification in rows were “none required” is identified for mitigation. While we support the choices we also accept that their success in terms of negative impacts and positive benefits to the environment are dependent on the holistic and joined up strategy developed for the CP2030, the CMP etc being applied in the integrated way proposed.	Report updated to give additional clarification.
SEPA	Choice 12 Building our new homes and infrastructure. Does recognise the need for mitigation but advise that this mitigation is set in the framework of the development of a wider more strategic assessment and the development of wider supporting infrastructure. A reference to the context in which mitigation is seen as being needed or not needed would be helpful.	Noted.
SEPA	Choice 14 Delivering West Edinburgh. SEPA has long supported the Gogar Burn diversion for improving water quality and the objectives of the River Basin Management Planning. Gogar Burn restoration will have multiple benefits. The river	Noted.

	<p>corridor and its flood plain (including consideration of climate change) is integral to addressing existing and future flood risk in this part of the city and providing access to an attractive green corridor with amenity value for new communities.</p> <p>SEPA is reviewing the reports and surveys that identified the options for the diversion including the route in the adopted LDP. Willing to share and discuss information and are not fixed on a particular option.</p>	
SEPA	<p>Cumulative effects Internal. Agree with the statement in the ER that it will be easier to establish the cumulative effects once final site selection etc is complete. SEPA recommends a strategic flood risk assessment is carried out to inform subsequent stages of the LDP. Consider the criteria and findings so far are sound with the qualification that the sites do need to be assessed to identify if they are in the same catchments for water course, have the potential to feed private cars into the same corridors or poor air quality or alternatively compliment each other in terms of support for public transport and active travel.</p>	<p>Noted. The Council commissioned consultants to prepare a strategic flood risk assessment. The results of the assessment have been incorporated into the ER.</p>
SEPA	<p>Cumulative effects external. A full understanding of these effects is only possible once final site selection process is complete, however, current work gives a sound framework for developing this fuller understanding.</p> <p>Edinburgh and surrounding regions waste water and water supply infrastructure will also be placed under pressure due to the impacts of climate change and the scale of development in the regions, this could result in increased sewer flooding and increase spills to the water environment and associated impact on water quality and stress on the ability of the environment to supply water. SEPA will continue to support work with councils and SW on how these impacts can be mitigated.</p>	<p>Noted. Report has been updated with final selection of sites and revised cumulative assessment.</p>
SEPA	<p>Brownfield site assessment. Support and endorse criteria used in assessment. But need individual assessments to be consider in the wider context of water catchments. In particular Leith harbour/tidal reach of Water of Leith, Braid Burn/Peffermill, Murray Burn culverted reach and West Edinburgh. SEPA recommends a strategic flood risk assessment is carried out.</p> <p>Other environmental factors also require a holistic approach. These factors include; air quality</p>	<p>Noted. The Council commissioned consultants to prepare a strategic flood risk assessment. The results of the assessment have been incorporated into the ER. The consultant commissioned to prepare the SFRA are</p>

	<p>management areas, transport corridors, potential for green/blue networks.</p> <p>There is a reference in ER to proximity to SEPA regulated sites. For sites that are close to such sites that this issue must be critical issue to be identified in site briefs and addressed in planning applications through assessments that inform the layout/design of the development.</p> <p>Draw attention to clustering of Waste Management Licences for activities in Forth Ports Control. Any possible implications from this should be addressed in the ER.</p>	<p>also preparing the strategic green blue network project enabling the two matters to inform each other.</p> <p>The impact of new sites on air quality has been assessed through the Transport Assessment. The results of that Assessment are included within the finalised Environmental Report. Site briefs address Health and Safety Executive issues where relevant.</p> <p>Noted. Cognisance has been taken of the clustering of licences, however, limited data on what activities are still operating in the area or the extent of impact means its contribution to the assessment is limited.</p>
SEPA	<p>Have submitted a spreadsheet with a flood risk assessment of brown and greenfield sites, which excludes an assessment of sites behind Leith flood risk defences. With regard to flood defences their purpose is to protect existing development and not to accommodate new development.</p> <p>Advise of the need for a holistic approach to development in Edinburgh that takes into account flooding in future due to climate change. The first principle is the avoidance of flood risk, by avoiding development in the functional flood plain, including allowance for climate change. Areas of importance for flood storage should be safeguarded for flood attenuation etc.</p> <p>Development should be located away from areas susceptible to surface water and groundwater flooding. Vulnerable uses should be located outwith 1:1000 year flood extent.</p>	<p>Noted.</p>

	<p>Surface water should be managed by SUDs.</p> <p>Approaches to flood risk and green and blue infrastructure needs to be planned and implemented in a strategic and integrated manner, particular in West Edinburgh.</p> <p>The National Flood Risk Assessment (NFRA) 2018 provides a summary of flood risk data and impacts of flooding. The data shows the West Edinburgh area as part of 2 Potentially Vulnerable Areas (Crammond Bridge and Outer Edinburgh, and Edinburgh Water of Leith. The area also lies within 3 proposed “Objective Target Areas” (Edinburgh Airport, Edinburgh Water of Leith and Edinburgh West)</p>	
SEPA	<p>Scotland’s River Basin Management Plan (2015-2021) has various statutory measures with deadlines. There are several measures ongoing to tackle water quality and remove fish barriers. Discussions are underway to remove the fish barriers from the Gogar Burn.</p>	Noted.
SEPA	<p>Air quality. SEPA commends the Council for strategically linking air pollution with the environmental considerations of the LDP.</p> <p>Transport emissions are the largest contributor to poor air quality in Edinburgh. The Council is currently developing plans and strategies to address air quality issues. Large scale development should not conflict with these plans but should instead compliment the Council’s vision for Edinburgh in terms of place making, climate change commitments and air quality.</p> <p>Effective planning can reduce the need to travel by carbon ensuring new dwellings are located in areas where facilities are readily available or alternative transport modes are available/can be made available.</p> <p>Policies that enforce high building standards can plan an important role in reducing emissions from heating and hot water. Incorporate good practice in all developments from the outset.</p>	Noted
SEPA	<p>Waste. New LDP should consider waste and the recycling and collection of waste from sites, minimise generation of waste to maximise opportunity to</p>	Noted. The CP2030 continues to provide clear policy guidance with regard to waste.

	<p>recycle. Existing policy DES 5 provides clear guidance on this matter.</p> <p>Encourage the consideration of circular places and circular use of materials to be incorporated into the very beginnings of the design concept.</p>	<p>This has been addressed in CP2030 policy requiring developers to demonstrate how their proposed buildings have been designed to be capable of adaption in future.</p>
SEPA	<p>Heat and energy. Consideration of heat and the impacts that heat demand and generation of heat to meet this demand have on climate change should inform the new plan. Incorporating renewable energy solutions, minimising energy demand and providing district heating within these sites would support delivery of the Scottish Government’s ambitions for renewable energy. The potential for decentralised low carbon heat sources should be considered at an early stage. With regard to energy generation recommend consider opportunity to develop energy storage.</p>	<p>Noted. The issue of heat demand and heat networks has been considered during the preparation of the site briefs and references included where relevant.</p>
SEPA	<p>Low Carbon Development. Low carbon SUDs are being proposed to meet PAS2080 standards. There is also PAS2060-carbon neutral specifications. Both of these may be useful for consideration in site briefs. Construction, operation and maintenance of infrastructure is responsible for 30% of greenhouse gas emissions.</p>	<p>Noted. Low carbon development is being considered in relation to policies and proposals as a whole and not just SUDs.</p>
J. Lawson, Archaeology, CEC	<p>Concerns regarding lack of consideration given to potential impact on historic environment, particularly archaeology and other non-designated assets.</p>	<p>The HES Canmore system was used to assess the impacts of potential development sites on non-designated heritage assets. Consultation with J Lawson during preparation of place briefs was carried out. This information has also informed the Environmental Report.</p>
J. Lawson, Archaeology, CEC	<p>Reference to “In addition to the designated sites above there are a variety of non-designated heritage assets and sites of known or suspected archaeological significance that can be found</p>	<p>Report has been updated.</p>

	across the wider Edinburgh area” is meaningless and does not give an adequate statement as to the scale of the city’s archaeological resources.	
J. Lawson, Archaeology, CEC	ER refers to reduction in scheduled monuments. This is misleading as since 2011 have gained 5 new sites. The apparent reduction is due to HES getting rid of dual (listed/scheduled) designations.	Report has been updated to refer to five new sites.
J. Lawson, Archaeology, CEC	Not all historic buildings, eg those that are pre 1919 are listed or within a conservation area. These buildings are historic assets none the less and important in providing a sense of place. Furthermore the importance of their retention in terms of climate change objectives such as carbon capture is recognised by the Scottish Government and the ER should recognise this.	Report has been updated.
J. Lawson, Archaeology, CEC	Table 3 Issue 5, does not mention archaeology other than scheduled monuments, thus giving a false impression to potential scale of impacts. More important issue than pollution, and should refer to two World Heritage Sites.	Report has been updated.
J. Lawson, Archaeology, CEC	Table 4 and Table 5 have the correct criteria but it is not true that detailed assessments have been undertaken of brownfield sites. Lack of consultation with J. Lawson on such sites. Such sites have been occupied in the past and likely to have significant archaeological implications in terms of preservation, excavation and analysis. The same issue applies to greenfield sites. Agree that in most cases this can be dealt with by agreeing detailed design/development briefs.	All sites were initially assessed using the HES Canmore national record. Consultation with J Lawson during preparation of place briefs was carried out. This information has also informed the Environmental Report.
J. Lawson, Archaeology, CEC	Landscape and Visual assessment of Greenfield Sites report does not significantly take into consideration the potential impacts upon the setting of archaeological sites and monuments nor consider the impacts on the city’s relic archaeological/historic landscapes. Therefore, the ER does not significantly take into consideration the potential impact on Edinburgh’s Archaeology and Historic Environment.	All sites were initially assessed using the HES Canmore national record. Consultation with J Lawson during preparation of place briefs was carried out. This information has also informed the Environmental Report.
Heriot Watt University	Assessment of the Riccarton East site should include consistent analysis of previous studies and more reports including findings of reporter's at the previous LDP Examination and DPEA.	Noted. However, all sites have been subject to a more recent analysis, which has been applied consistently to all potential development sites. This has been done in the context of finding new development land to

		meet the future needs of a growing Edinburgh to cover the period of the City Plan 2030.
7N Architects	It is clear that the council's preferred approach prioritises policies that aim to have a positive environmental and social impact. It also acknowledges that simply continuing the status quo is not an option if we are to address the challenges we face. We generally agree with the council's assessment of these impacts and support the drive to create a more inclusive, equitable and sustainable city.	Noted
Hallam Land Management	<p>The ER assesses the 3 Options identified in Choice 12. There is no real conclusive evidence as to what option would have less impact on the environment, the Council stating that most impacts are uncertain at this time. The Council considers that, by implementing Place Briefs and further assessment, the potential impacts of brownfield sites can mostly be mitigated. It goes on to say that Greenfield sites are likely to have greater impacts and although some of this can be mitigated through the provision of new infrastructure the longer commuter distances means there is a potential risk of additional vehicle trips and associated impacts, even with mitigation. We do not consider that this is a balanced or accurate reflection of the potential or likely impacts of each option. There appears to be no option that is better than the other in environmental terms.</p> <p>The Council's Site Assessment is limited in its use as it ignores the benefits which are delivered by the proposal on the site. The Council's approach is only focused on the environmental and other characteristics of the site and not how a potential proposal can mitigate or avoid impacts on the site's intrinsic characteristics. The Council's approach can be improved to assist its use as a validation tool for selecting a site for future development.</p> <p>Following the submission of representations to the Choices document, the Council will be in a position to have objective and comprehensive assessments prepared for each site.</p>	<p>Noted. However, the Council has chosen to pursue a brownfield strategy in the Proposed Plan.</p> <p>Noted. The purpose of the ER is to assess the strategic environmental effects of the various choices and site options, to inform decision making and to identify the mitigation required to remove or reduce the environmental impacts. The assessment was used to inform the preparation of proposed plan/place briefs.</p>

<p>Jupiter Art Land</p>	<p>Stress the importance of protecting that ‘essential setting’, the panoramic views and the unique cultural attraction of Jupiter Art Land.</p> <p>The allocation of housing land will impact significantly on Jupiter Artland’s operation, due to impacts on the important views out from the Park and also in terms of the surrounding landscape which is of huge importance to the setting and which is one of the main attractions for artists exhibiting their works at the site. Maintaining the important views which are afforded from the site are vital to its success and function. The information presented to date in the ER does not go far enough to mitigate the impacts to Jupiter.</p> <p>Further analysis of potential greenfield sites has been done as part of a Landscape and Visual Impact Assessment background paper and the Environmental Report, which have concluded that in terms of the landscape impacts, Overshiel and Bonnington (which Calderwood has been formed from) have no capacity for development.</p> <p>These assessments appear to have been disregarded in the identification of Calderwood as a ‘reasonable alternative’ for delivering the necessary housing land within Edinburgh. If the sites were to come forward, there is significant likelihood that it will impact upon Jupiter Artland.</p>	<p>The site has not been included in the Proposed Plan.</p>
<p>Wallace Land Investments</p>	<p>The Council’s Site Assessment is limited in its use as it ignores the benefits which are delivered by the proposal on the site. The Council’s approach is only focused on the environmental and other characteristics of the site and not how a potential proposal can mitigate or avoid impacts on the site’s intrinsic characteristics. The Council’s approach can be improved to assist its use as a validation tool for selecting a site for future development.</p> <p>Following the submission of representations to the Choices document, the Council will be in a position to have objective and comprehensive assessments prepared for each site.</p>	<p>Noted. The purpose of the ER is to assess the significant environmental impacts of the choices and site options within the Main Issues Report and to inform decision making. It also suggests mitigation measures to address the impacts in part or full and if impacts cannot be mitigated this is recognised in the report. The information was used to inform the preparation of the Proposed Plan. The Finalised ER will be</p>

		updated to take cognisance of any further information available as part of the process of preparing the Proposed Plan.
Miller Homes and Wheatlands Farming Partnership	<p>The Council's ER Site Assessment is limited in its use as it ignores the benefits which are delivered by the proposal on the site. The Council's approach is only focused on the environmental and other characteristics of the site and not how a potential proposal can mitigate or avoid impacts on the site's intrinsic characteristics. The Council's approach can be improved to assist its use as a validation tool for selecting a site for future development.</p> <p>Following the submission of representations to the Choices document, the Council will be in a position to have objective and comprehensive assessments prepared for each site.</p>	Noted. The purpose of the ER is to assess the significant environmental impacts of the choices and site options within the Main Issues Report. It also suggests mitigation measures to address the impacts in part or full and if impacts cannot be mitigated this is recognised in the report. The information will be used to inform the preparation of the Proposed Plan. The Finalised ER will be updated to take cognisance of any further information available as part of the process of preparing the Proposed Plan.
Association for the Protection of Rural Scotland	<p>ER does not give sufficient weight to the multifunctional values provided by the Green Belt, as well as the importance of landscape and prime agricultural land for home food production to reduce reliance on food imports vulnerable to adverse climate change effects.</p> <p>There is no mention of the 2008/9 Landscape character assessment of the Edinburgh Green Belt by Land Use Consultants.</p> <p>For example:</p> <ul style="list-style-type: none"> * Table 3 Relevant Environmental Issues (p.15) does not mention Green Belts * Table 4 Methodology for Assessing Choices does not include Green Belt or green networks * Table 5 Methodology for Assessing Sites only considers 'defensible boundaries' for Green Belts and not their continued loss to 	Noted. The purpose of the ER is to assess the significant environmental impacts of the choices and site options within the Main Issues Report under a series of environmental topics. The impact of the development of a site on the Edinburgh greenbelt is just one consideration amongst many other equally important and relevant considerations. A new landscape assessment was carried out by

	<p>development</p> <p>Should the ER seek to assess the effects of Covid-19?</p>	<p>consultants to give an up to date picture.</p> <p>It is not the role of the ER to consider the impact of Covid-19 although it was considered in the preparation of the development strategy in the proposed plan.</p>
Inch Community Education Centre Association	<p>The 'Cultural Heritage Plan' of Edinburgh included in the Environmental Report does not include any mention of Inch House or Park. Given that Inch House is an A-listed historic 16th/17th Century tower house and along with its adjacent walled garden ,is of significant historic and cultural value and interest, this is a significant omission from the CityPlan 2030 supporting documents that should be corrected.</p>	<p>Noted. The ER makes reference to the importance of listed buildings in the baseline information. It is not practical to include specific references to all the listed buildings in Edinburgh, nor would it be balanced to make specific references to particular A listed buildings.</p>
Friends of Midmar Paddock	<p>Welcome the reference to the Braid Hills in the ER as one of the outstanding features of Edinburgh within easy reach of the City Centre and the statement that Edinburgh has open spaces of world class value. These include topographic and natural features that define the City, such as the Braid Burn river valley. We very much agree that these spaces “connect with footpaths, green corridors and water courses to form a strong green and blue infrastructure within the urban area”. Midmar Paddock is a prime example.</p>	<p>Noted.</p>
Scottish Wildlife Trust	<p>As this report lists the Local Biodiversity Sites - which are crucial to the green network for people and nature and ecosystem services of the whole of Edinburgh - but does NOT mention any impact on them - I must presume that all proposed 'change of landuse/development sites proposed or inferred by policy changes in this plan do not impact them - if they did you would also have had to be proposing a change in the local plan policies currently protecting them.</p>	<p>Noted. The impacts on Local Biodiversity Sites are considered under question B2 of the site assessment.</p>

Old Town Community Council	On the environment, the 'curve' is now so tight that it is impossible not to be behind before the ink has dried on whatever proposals you have. So on the environment we will need to keep a constant review and upscaling of response just to keep up with new thinking.	Noted. The ER will be updated to assess the contents of the Proposed Plan.
Murrayfield Community Council	Flood prevention should be uppermost in all choices.	Noted. Flooding was a key consideration in the SEA of the sites within the MIR. A strategic flood risk assessment was commissioned and the results of the assessment have been included within the ER.
Trinity Community Council	There isn't enough about trade-offs and priorities. The most important goal is carbon neutrality, but it's mentioned almost in passing. I can see nothing in the report telling the reader what the greenhouse gas impact of current developments is expected to be, or (a) how we're going to get to carbon neutrality, or (b) when, or (c) what the costs of achieving it will be. What are builders of houses, offices and other structures being told to do? And what about atmospheric pollution? As I understand it, Edinburgh (and lots of other cities) is at times in breach of the law. What's it going to about that, and when? We don't want to have to wait until 2032 for an improvement.	Noted. The role of the ER is to assess the significant environment impacts of the proposals and proposed policy choices contained within the MIR. Existing committed developments with consent form part of the baseline of the report and as a result are not assessed in the SEA. Developers are required to meet the latest building standards, although the MIR under Choice 2 proposes that all buildings and conversions meet the zero carbon/platinum standards.
Liberton and District Community Council	<p>Note the detail in the ER particularly with regard to the assessment of the potential development sites.</p> <p>Note the concerns raised over surface water and landscaping with regard to sites 188 (Rae's Crescent), 190 (Alnwickhill Road TA Centre) and 289 (Liberton Hospital). We also note the negative assessment afforded to potential development of sites 127 (East of Burdiehouse Road) and 11 (South of Lamg Loan).</p>	Noted.

	<p>Elsewhere in the report we note the negative assessments of potential development on greenfield sites, particularly regarding the five sites at Gilmerton.</p> <p>We are not convinced that high density developments minimise the need to travel.</p>	
<p>New Town and Broughton Community Council</p>	<p>The environmental issues most relevant to our area are those concerned with the protection of the city centre environment and heritage, particularly in relation to the large residential population. Most of the comments are sensible, albeit lacking in detail as to how they might be implemented, which will be an important factor in how effective and acceptable the policies are.</p> <p>The high residential function of the centre, above any other British city, is a valuable asset that often feels threatened by other activities – excess traffic, licensed premises, noise, over-tourism etc. – and each activity and new development must be assessed against its impact on the environment and quality of life of the existing residential population.</p> <p>Cultural Heritage is also a major component of Edinburgh’s environment. The New Town is part of the World Heritage Site and is also protected by Conservation Area and Listed Building legislation. It is also under significant development pressure. The Statement recognises in part the need to protect the cultural heritage from the negative impacts of development. However, there is scant mention in the documentation of the importance of ensuring townscape and urban design quality in new buildings; a major omission is any reference to architectural quality, and developments of inappropriate massing, scale, skyline and materials continue to be allowed by a reactive planning system which sometimes capitulates in the face of developer pressure. High quality urban environments have been demonstrated as having a beneficial effect on the health and well-being of individuals and of societies.</p> <p>In terms of new development, the Statement aims for carbon neutral buildings. This is commendable but it must be genuine and not simply offsetting in third world countries. It should also acknowledge that existing buildings – which will continue to comprise the mass of properties in the NTBCC area – may not meet the highest standards of insulation</p>	<p>Noted. The impact on Cultural Heritage is considered under questions H1-6 of the Strategic Environmental Assessment. Any mitigation required to address these impacts is set out in the mitigation section of the individual site assessments and identified in the place briefs where relevant.</p>

	and energy saving, but have already paid off their carbon footprint many years ago, more than compensating.	
Crosswinds Development Limited	The Landscape (L1) statement contradicts the comment that the Crosswind site is likely to have a low risk affect on any city protected views. The site will instead deliver a visible landscape as its current use is secure and inaccessible. We also disagree with status given at A1 - the Crosswind site is the largest new brownfield development which is right next to a tram stop and a railway station, the public transport accessibility is very strong in this location.	Noted. Landscape assessment corrected. Site is large and a lot of the site currently has poor access to existing public transport services, and therefore mitigation identifies the need to address this in the context of redevelopment to ensure better mode share.
Stirling Developments Limited	The comments raised within the Environmental Report in relation to the West Overshiel and West Bonnington sites can be adequately mitigated through the sensitive masterplanning of Calderwood Edinburgh.	Noted.
HF	It appears that overall there are less negative environmental impacts foreseen than positive/neutral ones, although this will depend very much on individual circumstances.	Noted.
J M Gillies	Environmental goals need to be carefully balanced against growth, housing, and quality of life.	Noted.
R MacRae	Denser living does have an impact on air pollution (more of everything, cars, delivery vehicles, buses), and on other services such as waste removal, which is always a problem in our area, and roads and pavements (more use).	Noted.
G Clapton	Any aspect of the Choices Plan that goes ahead should have a specific and focused environmental report available for the residents/community that will be impacted by the changes.	Noted. The finalised ER includes a detailed assessment of all of the Proposed Plan policies and development proposals.
J Bryant	Higher density housing will lead to more concentrated impacts from more unpredictable or more extreme weather, it might be worth considering learning from nations with greater provision for dealing with city (or higher) level emergencies (e.g. Japan, Chile, the Netherlands) to start working out how to put these ideas into practice in Edinburgh as some of them are likely to impact infrastructure and new developments and including them now would likely save younger generations paying the price in the future.	Noted. The various requirements set out in the plan in terms of policies and the place briefs will address impacts of climate change including more extreme weather.

J Faulkner	It is long overdue that the environmental cost of projects is factored into decisions.	Noted.
G Checkley	It's clear from the report that there could be a lot of habitat loss and negative effect on the environment if any development outside of brownfield sites is allowed. This cannot be allowed to happen, zero carbon by 2030 will require restricted growth.	Noted. The purpose of the ER is to identify the significant environmental impacts of the various choices set out in the Main Issues Report, and the results of this analysis has informed the preparation of the Proposed Plan and the preparation of its strategy, its policies and its proposals.
J M Reed	I believe that the report could make more of the public health impacts of moving towards a zero carbon economy. More attention to the current health impacts/death toll of urban emissions/excessive private vehicle use, and the possibility the plan holds for negating these.	Noted. The purpose of the ER is to identify the significant environmental impacts of the various choices set out in the Main Issues Report, and the results of this analysis will inform the preparation of the Proposed Plan and the preparation of its strategy, its policies and its proposals.
M Ravilious	<p>The Air and Climatic factors (A1-A4) cover air pollution, minimising travel distances, and the provision of low/zero carbon technologies. I would like to see additional category's, as I feel these criteria are inadequate and miss out on some impacts. My proposals would be:</p> <p>A5: "supports/encourages personal lifestyle changes which are likely to have positive environmental impact"</p> <p>A6: "supports green recovery"</p> <p>A7: "reduces air travel to/from Edinburgh"</p> <p>Criteria in this section should be weighted, so that these factors become more significant than others, because they are: we are in a global state of climate emergency, the impact of which will be far more severe than COVID-19.</p> <ul style="list-style-type: none"> - The UN recognises climate change as the defining issue of our time, and the greatest threat to global security we have ever faced. - The world bank has warned "if we don't do 	<p>The questions in the ER are considered sufficient to identify the significant environmental impacts of the various choices and proposals as required by the Environmental (Scotland) Act 2005.</p> <p>The SEA guidance does not currently require the criteria within the assessment to be weighted with respect to the various environmental topics. Instead the SEA is</p>

	<p>something immediately, climate change could push 100 million more people into poverty by 2030."</p> <p>In this context, decisions which for example "encourage the provision of low/zero carbon technologies" cannot be considered as having equal importance to "Does the choice enhance the landscape setting of the city?"</p> <p>In general I think the plans are heading in the right direction, but need to be more ambitious. I think the plans must be centred around reaching net zero (carbon), and all decisions should reference back to this one core criteria. When it comes to climate change, I believe the vast majority of Edinburgh residents would get behind ambitious, progressive plans.</p> <p>I would propose doing this by:</p> <ul style="list-style-type: none"> - Commissioning a transparent independent assessment of GHG impact of different sectors, by a university with expertise in this area. Set this up so that no input is allowed by any commercial sectors, or the council themselves, to avoid bias through vested interests. - Prioritise changes which have climatic impact above other factors (Since the climate emergency poses the greatest threat we have ever collectively faced). 	<p>required to identify the significant environmental impacts under the various topics.</p> <p>Noted. However, the approach adopted in the ER meets the requirements of the Environment (Scotland) Act 2005 and the SEA guidance.</p>
P Barnes	<p>In the light of the present pandemic, the environmental impact of policy is even more important. Much thought has gone into the ER and it is important that we support policies that protect the environment and do not allow panic over the effects of the pandemic on economies to reduce them.</p>	<p>Noted.</p>
N Tulloch	<p>Whilst the report is detailed and comprehensive, given that Edinburgh is a coastal city, I would like to have seen more on the issue and potential impact of global warming and rising sea water levels. Clearly rising sea water levels could impact on any proposed development around the coast.</p>	<p>Noted. The Council commissioned consultants to prepare a strategic flood risk assessment which includes all sources of flood risk. The results of the assessment have been incorporated into the ER.</p>
R Nealon	<p>Accessing the strategic flood prevention reports appears impossible. This information is needed</p>	<p>The Council commissioned consultants to prepare</p>

	urgently to inform this plan and should also be made available to public in as accessible a way as possible.	a strategic flood risk assessment. The results of the assessment have been incorporated into the ER.
G Drummond	The council preferences seem least harmful. By far the most important environmental concern must be the reduction of CO2 emission and atmospheric pollution.	Noted.
A Woodgate	<p>Appendix 2 is clear but seems overwhelmingly positive! I think it could provide better critique.</p> <p>Choice 2 doesn't seem 'neutral' across the board - surely there will be impacts</p> <p>Choice 13 growth of universities and business surely will have an impact on air quality just through the nature of more people being in a given area.</p> <p>Choice 14 is likely to have biodiversity impacts, although with good design this could be positive.</p> <p>I think the 'effect reasonable' analyses suggest doing nothing (using existing policies) will have no impact and I am not sure this is true.</p>	<p>Noted. The assessment for Choice 2 has been updated and records a range of positive impacts but also a negative impact on cultural heritage.</p> <p>Choice 13 is not expected to have direct significant environmental impacts.</p> <p>The environmental impacts from Choice 14 were uncertain at the time of analysis. The west Edinburgh allocations in the proposed plan have been assessed.</p> <p>The SEA has been prepared in line with the SEA guidance.</p>
G Russell	As is often the case, the ER seems to be a stand-alone document. There should be a close relationship between it and the city plan with appropriate cross references.	Noted. Although the ER is a stand alone document, it is intended to inform the preparation of the City Plan 2030, by identifying significant environmental effects and potential mitigation to address these effects in part or whole.

J Carothers	All I can say is that that the protection and enhancement of the natural environment within the City is of utmost importance. We have to take the Climate Emergency seriously.	Noted
M Lemery	In general, please consider environmental impacts beyond the local ones (for instance from importing goods and materials and promoting businesses and industries that do), and please consider environmental impact beyond carbon: biodiversity, ecosystems, soils, water...	Noted. The ER looks at the cumulative environmental impacts within Edinburgh and outwith Edinburgh.
P Brown	I'm surprised that so many answers consider that existing Policy would be "net neutral". I would have thought that much of existing Policy would lead to environmental deterioration as population expands over the 10 years of the plan.	Noted. Existing policy already seeks to mitigate the environmental impacts of growth, however, the preferred choices seek to mitigate the effects further.
A Clark	<p>Data is mostly for the period up to 2018 so belongs to the pre-Brexit economic era.</p> <p>I note (page 8) that Noise is seen as a problem for people living in urban areas. Lanark Road/Lanark Road West from Juniper Green to Balerno experiences significant traffic noise between about 6.30am and 9 am and from mid-afternoon to about 7.00pm. Associated with that is air quality and the single air quality monitor at 610 Lanark Road is both insufficient and at the wrong height to pick up low level particulates. There need to be more monitors with publicly visible indicators to assess air quality at Gillespie Crossroads, Blinkbonny Road/LRW, Currie Post Office/LRW. More assessment is needed within these villages both on the main road and heavily trafficked routes near schools. (Page 14(2) also refers.)</p> <p>Covid-19 outbreak is likely to discourage the use of mass transport systems in line with Government advice to distance oneself.</p> <p>I note (p9) that the majority of farmland in the area is classified as prime quality. (Note the Scottish Land Use Strategy ('Getting the best from our land') contains 13 Principles. Principle C reads: 'Where land is highly suitable for a primary use (for example food production, flood management, water catchment management and carbon storage) this value should be recognised in decision-making.' Section 2.1 states: 'in support of our goals on food security, we</p>	<p>Noted. However, the ER can only use the most recent available data.</p> <p>Noted. The ER recognising the existing problems associated with noise and air quality as part of the base line.</p> <p>Noted. However, this is likely to be a short term impact. No change to ER required.</p> <p>Noted. However, comment relates to the MIR 'Choices' and not the content of the ER.</p>

	<p>should continue to ensure that our prime agricultural land retains its capacity for food production.’ I object to the suggestion (p13) that more prime quality agricultural land should be released – land beyond the ‘Robust Green Belt Edge’ formed by the Outer City Bypass must be retained for agricultural purposes until government has defined how much cultivatable land can be lost to other purposes, in the face of Climate Change. It is not just prime quality land that is at stake – lesser quality farmland is an increasingly scarce commodity – all productive farmland needs protection. One day someone is going to discover we’re short of sufficient cultivatable land.</p> <p>Pages 25 and 54 and Appendix 4 (p 190) refer to a greenfield site ‘East of Riccarton’. The analysis states the site is ‘within 10 minutes walking distance of local convenience services’ which is hard to comprehend as Currie’s shops are well beyond that timeframe. It appears the site has been assessed, on plan, as though Wester Hailes is the focal point and is 10 minutes’ from a point on the east boundary, which is a fundamentally flawed approach when the Bypass is in the way!</p> <p>The statement that ‘Development of the site would result in an urban extension to link to the existing university campus’ is sadly only too correct – but it is green campuses like this that are attractive to university-related clean industries and their setting is therefore important.</p> <p>I disagree with the assessment that the ‘East of Riccarton’ site should be considered as ‘a single site to the East of the existing Heriot-Watt University’. It is in fact part of a much larger landscape of which the Riccarton Estate (the previous site owner) was a fragment as will be seen when surveying the landscape. It cannot therefore be treated in isolation. I disagree that its loss to development ‘would not have a cumulative visual impact’. It is currently protected by the Outer City Bypass which like a city wall forms a Robust Green Belt Edge – an essential defence against sprawl into the countryside. The statement that ‘development of the site would result in further loss of rolling farmland’ is correct but saying ‘the site is reasonably well contained and a significant amount of rolling farmland would be retained in this part of the city’ is</p>	<p>Noted. However, site has not been included in the proposed plan.</p> <p>Noted</p> <p>Noted. However, site has not been included in the proposed plan.</p>
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	<p>pure semantics – it is clearly visible from various elevations.</p> <p>Local people have tried very hard for many years to retain this fertile land for cultivation – most recently respecting application 16/05217/PPP (refused by the Council) followed by appeal PPA-230-2246 (refused by DPEA) for fields at the south edge of the site. The reporter concluded that ‘the proposals would detract from the landscape quality and rural character of the area’...[and that development there]... ‘would create a less robust green belt boundary, as there is no real distinction in landscape ... between the appeal site and the neighbouring fields to the north. The existing strong green belt boundary on the east side of the wooded Riccarton Campus and Murray Burn would be replaced by a weak one’. The reporter observed that building on these fields would make it difficult to resist building on adjacent fields to the north – the East of Riccarton proposal - and one might add to the west where developers have already pressed their interests.</p> <p>This assessment is further flawed in that it fails to consider the viability of remaining farmland should this site be reallocated to the built environment.</p> <p>It is fields such as these that give Edinburgh its much appreciated setting. As LDP2016 states (para.34), one of the purposes of the Green Belt is to ‘protect and enhance the quality, character, landscape setting and identity of the city and neighbouring towns.’ That is worth restating. As CEC planners refused part of this site for development within the last two years, one has to ask how the Council was persuaded to change its mind so soon thereafter.</p> <p>Reading the cumulative effects on the Landscape (pp27/28 and Appendix 3) reveal how much Edinburgh’s setting would be damaged by continued urban sprawl. It is also clear that adjacent authorities are now creeping so close to the City boundary, that cross border sprawl is becoming inevitable. The fact that an adjacent authority hasn’t proposed development up to its boundary is not a reason why Edinburgh should get there first! It will then be impossible to determine what is Edinburgh and what is a neighbour – a bit like trying to identify the towns that make up London from an aeroplane.</p>	<p>Noted. However, site has not been included in the Proposed Plan.</p> <p>Noted. However, assessing the viability of the remaining farmland is beyond the scope of the SEA.</p> <p>Noted.</p> <p>Noted.</p>
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	<p>I note (page 53) that CEC has yet to produce a surface water management plan for Edinburgh. This is critical in order to ensure that developments do not discharge excess water into watercourses that are near their capacity. What will this management plan look like – will new ponds be created within developments to take say ‘SUDS + 10%’?</p> <p>Appendix 4 (Brownfield Site Assessment) – Redford Barracks (pp117/118). Noted that a Place Brief is being prepared however it would have been helpful to know what this may contain.</p> <p>Page 207 is a drawing annotated “Health & Safety Executive”. The significant elements appear to be outlined in red however there is no description as to what these are. I assume that those on the bottom left of the plan refer to national gas transmission lines, described in the 2006 RWELP as “Hazard Consultation Zones”. Is that correct? These lines should be included in the 2030LDP.</p>	<p>Noted. A surface water management plan is not currently available. However, a strategic Flood risk assessment has been commissioned to inform the SEA.</p> <p>Noted. The place brief was not available at the time of the assessment.</p> <p>Noted. The plan identifies the gas pipelines. The hazard consultation zones are not included within the Proposed Plan as they are considered sensitive data.</p>
L Gunstener	<p>Whilst the Environmental Report states that there is no impact from the City Plan MIR on Fife, the potential for a second runway (or other expansion) at the airport has the potential to negatively impact communities in several neighbouring authorities including Fife. To date, Edinburgh Airport have largely failed to assess these impacts, focussing assessment on the City of Edinburgh, despite also generating high noise levels and other environmental impacts elsewhere. Whilst the addition of new flight paths is not controlled by the planning system, support for additional infrastructure at the airport supports further growth and the environmental impacts on neighbouring authorities must therefore be taken into account.</p>	<p>Noted. The purpose of the ER is to assess the significant environmental effects of the various choices set out in the Main Issues Report/Proposed Plan. The second runway at the airport does not form part of the MIR/Proposed Plan. However, the ER does consider the impact of the airport on any potential development sites under the site assessment.</p>
A Thomson	<p>As far as am concerned, the Environmental Report will take precedence over all the decisions made in connection with the City Plan 2030.</p>	<p>Noted. The ER has informed the preparation of the Proposed Plan.</p>

<p>Dr L Naylor and Dr J Hansom</p>	<p>Coastal flooding and sea level rise are only mentioned once in the ER. We recommend that this assessment uses coastal and pluvial as well as fluvial flood risk maps from SEPA, and also that the most recent 1:200 year sea level rise projections from UKCP18 are used to inform the coastal land use decisions in the CityPlan.</p> <p>Coastal erosion risks are not mentioned the CityPlan Environmental Report. We recommend that these risks are added to the report. Due to the historic reclamation of land along much of the built up section of Edinburgh’s coast from Silverknowles to Joppa, there is a need to assess both the measured erosion rates (using Dynamic Coast, www.dynamiccoast.com) and the natural erosion susceptibility of these areas using the SEPA Coastal Erosion Susceptibility Maps (https://www.sepa.org.uk/media/163411/natural-susceptibility-to-coastal-erosion-summary.pdf and the maps via: https://map.sepa.org.uk/floodmap/map.htm). These maps show the potential erosion risks if the current standard of coastal protection (e.g. seawalls) were not present. Much of the coast along this stretch is comprised of unconsolidated and thus erodible reclaimed land. We also recommend the CityPlan team looks at, and acts on, the forthcoming Coastal erosion assessment for Edinburgh prepared by the University of Glasgow in mid 2020 and the Dynamic Coast 2 datasets (late 2020).</p> <p>Mitigation of flood risk is identified as on-site measures as part of the development process. This type of statement has been used around Scotland in the recent past to allow on-site measures such as land raising as part of site redevelopment. These measures, whilst they may be suitable for managing some flood risks, they are not recommended where there is a risk of coastal erosion as the raising of land levels typically involves adding soft, soil-based sediments which are easily eroded.</p> <p>These changes need to sit alongside changes to the CityPlan document itself to help address key environmental areas that need strengthening. These include: More substantive recommended changes to the CityPlan document: Coastal flooding, coastal erosion, storm and sea level rise risks are not mentioned in the current CityPlan</p>	<p>Noted. The Council commissioned consultants to prepare a strategic flood risk assessment. The results of the assessment have been incorporated into the ER. Cognisance has been taken of coastal erosion in the assessment.</p> <p>Noted. Reference to coastal erosion has been added to the report in the table on environment issues.</p> <p>Noted. Land raising is not being supported as part of the mitigation measures identified in the assessment.</p> <p>Comment on the plan content is noted. Coastal erosion and flooding has been addressed in the Proposed Plan.</p>
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	<p>document. This is a major flaw and points to lack of awareness of the import of key Committee on Climate Change Risk Assessment (CCCRA reports) and planning guidance.....without major investment, in 30 yrs time the coast will not be where it is now....and maintaining defences in perpetuity may not be sustainable apart from key assets (e.g. Leith port).</p> <p>Flood risks are mentioned in the report on page 45. We recommend that an additional statement is made that mirrors this statement for coastal flood and erosion risks, as follows, <i>“Protect and restore the coastal environment to create a clean and natural coastal corridor restored to good ecological status. Where sufficient space is safeguarded from development on land in the CityPlan to provide a multi-use corridor that can help buffer people and assets from extreme flood, sea level rise, storm surge and erosion events. This would improve the climate resilience of future property and assets near the coast: if the multi-use corridor were nature-based then a recreational asset is created and a public engagement message successfully delivered.”</i></p>	<p>Noted. A reference to coastal flood risk and erosion has been added to Table 3: Relevant Environmental Issues.</p>
S Hawkins	<p>The assessment of the Sir Harry Lauder Road site (Evans Halshaw) is out of date and takes no account of the consented development in course of construction.</p>	<p>Site under construction does not include former Evans Halshaw site.</p>
G Cantley	<p>Welcome:</p> <p>1) The reference to the Braid Hills as one of the outstanding features of Edinburgh within easy reach of the City Centre. This term is understood to cover Blackford Hill, the Hermitage of Braid and Midmar Paddock. These are designated as Green Belt, Open Space, Local Nature Conservation Site and as Special Landscape Areas.</p> <p>2) The statement that Edinburgh has open spaces of world class value. These include topographic and natural features that define the City, such as the Braid Burn river valley. We very much agree that these spaces “connect with footpaths, green corridors and water courses to form a strong green and blue infrastructure within the urban area”. Midmar Paddock is a prime example.</p> <p>3) The statement that City Plan 2030 should support the overall protection of the landscape character of areas as well as their visual quality and that it will protect where appropriate, designated areas from</p>	<p>Noted.</p>

	<p>inappropriate development and ensure new developments are designed and sited to minimise landscape/visual impacts.</p> <p>4) The statement that you want to create a new policy which will help connect our places, parks and greenspaces together as part of a multifunctional, local, citywide, regional, and national green network.</p> <p>5) The statement that you want to introduce an 'extra large green space standard' which recognises the need for communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces (Midmar Paddock is 4.17ha.).</p> <p>6) The emphasis on developing local walking and cycling links around the city. I believe that Midmar Paddock has a major and continuing role to play in this.</p> <p>I do not welcome:</p> <p>The possible release of Green Belt for future housing needs and the statement that there may still be a need to identify greenfield sites to meet development requirements.</p>	
M Forrest	I expect the environmental impacts of the plan to be much more positive than the status quo.	Noted.
H Soutar	<p>It underestimates the threat of the loss of our WHO World Heritage status due to some of the developments that have already occurred in the city centre. Tourists come to see the historic city and if that history is overshadowed due to modern developments tourists won't come.</p> <p>We are at the tipping point of risking the historic value of the city.</p> <p>I think ALL new plans needs to have that considered and include requirement of materials used in new developments to fit with the historic nature/materials of the city - this seems to work well in some developments, but not others.</p>	<p>Noted. However, the ER purpose is to identify the significant environmental impacts of the choices set out in the Main Issues Report/Proposed Plan, and not the impacts of existing or previous consented developments.</p> <p>Comment on plan content is noted.</p>
J Hudson	I think that your entire City Plan 2030 is thorough, well thought out and well-produced. This therefore applies to the Environmental Report also.	Noted.
S Munro	Carbon accounting inadequate	Noted. However, the ER purpose is to identify the significant environmental impacts of the choices set out

		in the Main Issues Report/Proposed Plan.
C Judson	Group 11 (Astlie Ainslie) (no. 259). While this may technically count as brownfield it is, or has the potential to be, different in character from many other such sites which are assessed. Even with the existing health service structures it remains a large and relatively open site. With the health service structures due to become redundant there is potential for significant public greenspace with attendant benefits for biodiversity, wildlife, recreation and community amenity and wellbeing. The assessment itself also identifies actual or potential constraints on development such as the site's location within the Grange Conservation Area, the presence of at least one listed building and problems with surface water. I note the 'Mitigation' possibilities identified in the assessment, and I agree that 'comprehensive visual and landscape appraisals' would be required. But I think the Council should start from a presumption of little or no housing development here in order to deliver the environmental benefits I have mentioned.	Noted.
J Outterson	I would like it to show what changes to the plan are need to ensure a net zero outcome can be achieved. I would like that the results and recommendations of this environmental report are to be enforced into the city plan to ensure that the plan is environmentally led. The plan has a lot of ambition but sometimes focuses on the wrong thing. A report to show how to amend the plan to strengthen its environmental credentials is important, but it must be listened to.	Noted. However, the purpose of the ER is to identify the significant environmental impacts of the choices set out in the Main Issues Report/Proposed Plan. It is also required to identify mitigation required to address these impacts. Where it is not possible to address these impacts in full, this is identified in the ER. The recommendations in the ER are intended to inform the preparation of the Proposed Plan but they are not required to be enforced or binding.
M Sommerville	The adverse effects of the loss of prime agricultural land seem to have been completely ignored in SE Edinburgh.	The impacts on prime agricultural land have been identified in the assessment.

Davidson's Mains and Silverknowes Association	Much of the planned development has a significant traffic impacts on the existing roads structure leading to congestion and pollution with nothing in the plan to mitigate any of the effects.	Noted. The purpose of the ER is to identify the significant environmental effects of the choices within the Main Issues Report/Proposed Plan and to identify mitigation to address these impacts where feasible. Existing consented developments are not required to be assessed and form part of the baseline.
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Table 5: Summary of Comments on City Plan 2030 Proposed Plan Environmental Report

Organisation	Issue/Comment	Implications
NatureScot	Rover, coastal and surface water flooding (p.14): Suggest the role of sea level rise, increased coastal erosion and more frequent/intense storms should inform policy and proposals in City Plan 2030. The outputs from Dynamic Coast 2 should be used alongside other relevant information and stakeholder inputs to support a strategic approach to coastal change through a Council-led Coastal Adaption Plan.	Noted. As set out in paragraph 2.79 of the Plan, regard has been had to current and ongoing work by Glasgow University and SEPA on Scotland’s Dynamic Coast. This is reflected for example in Policy Env 29 Waterside Development which makes reference to erosion.
NatureScot	Open space should be included in the assessments of community infrastructure needs. There is increasing evidence of the importance of open space to communities.	Noted. The assessment of sites included access to open space under questions M1 and M2. In addition, the Council has and continues to update its open space strategy to maximise access to a range of good quality open spaces.
NatureScot	Assessment of Environment Effects and Mitigation (p.33): Concludes “could probably be addressed	Noted. However, impacts identified are

	through mitigation”. Very uncertain conclusion and suggest a strategic approach to change in West Edinburgh would offer greater opportunity to address changes through mitigation. A review of supporting plans/strategies such as West Edinburgh Landscape Framework will be essential. If mitigation is left to individual allocations required mitigation will be less effective.	associated with relocation of the Royal Highland Centre. NPF4 no longer identifies Edinburgh Airport enhancements, including the relocation of the showground to accommodate them, as a national development.
NatureScot	Greenspace and Infrastructure Proposals (p.36) Agree, but would also be associated benefits in wellbeing.	Noted. The text refers to health benefits.
NatureScot	Cumulative Effects (p.36): Too focused on poor air quality as opposed to wider impacts on health. Assessment should be more broad ranging as health and wellbeing affected by many factors including development that leads to reliance on private car and lower levels of physical activity, access to open space etc. Strategy has positive effects in this respect.	Agreed. The assessment in Appendix 3 has been amended to cover health and wellbeing more broadly.
NatureScot	Monitoring; Biodiversity, Soil, Landscape and Townscape (Table 6): Caveat “May have to be restricted to housing and large commercial developments” should be explained further. Restricting assessment of soils, greenbelt and SLAs to these types of development may overlook incremental losses.	Noted. The Council is taking a proportionate targeted approach, based on information available via its Uniform system (which records planning applications). Smaller losses, potentially including some that did not require planning permission is likely to be challenging to monitor.
NatureScot	Astley Ainslie Place policy (P.65). Agree unlikely to be significant environmental impacts of Astley Ainslie allocation. However, may be minor impacts important in context of site that should be addressed via relevant assessments/requirements in the proposed site brief.	Agreed. The Place Brief the Council is preparing will provide the means by which minor impacts can be addressed.
NatureScot	Place based policies, Edinburgh Waterfront (P.65-67). Suggest role of sea level rise, increased coastal erosion and more frequent/intense storms should inform policy and proposals in CP2030. The outputs from Dynamic Coast 2 should be used alongside other relevant information and stakeholder inputs to support a strategic approach	Noted. This assessment looks at the environmental effects associated with the Place policy. The detailed impacts of the development of the site are set out in

	to coastal change in these place policies and through a Council led coastal adaption plan.	the individual site assessments.
NatureScot	Place base policies West Edinburgh (P68-69). Understand that the majority of greenfield land is existing allocations but suggest this is stated more clearly to avoid impression further greenfield land is being released. Benefits more likely if a multi-functional green/blue network accompanied by a clearly defined delivery plan is part of the strategy for West Edinburgh.	Agreed. A reference has been added in the summary. Noted. This is a specific requirement as set out in Principle c of policy Place 16.
	Place based policy Redford Barracks (P.69-71). Unlikely to be significant impacts but may be minor impacts in the context of the site that should be assessed by relevant assessment/requirements in proposed Place Brief.	Agreed. The Place Brief the Council is preparing will provide the means by which minor impacts can be addressed.
Historic Environment Scotland	Note that in some cases (Sites H25, H26 and H29) where effects on non-designated historic assets are identified but this is not reflected in site requirements. Recommend these are reviewed.	Noted. However, sites H25, H26 and H27 site assessments refer to potential archaeological remains both under the summary and mitigation sections. City Plan 2030 Appendix D requires developers to carry out an archaeological assessment of these sites.
SEPA	It is important that the CP2030 and the ER take account of the Energy Strategy, Heat Networks (Scotland) Act 2021 and the forthcoming Local Heat and Energy Efficiency Strategies and embed the outputs in them.	Noted. However, Policy Inf 16 sets out a requirement that new developments should connect to existing or planned heat networks. Para 3.219 states that the Council will review and update guidance regarding heat networks when the Local Heat and Energy Efficiency Strategies become available.
SEPA	A significant programme of regeneration work to implement the Water Vision is now underway to consider future fitting water management in the context of wider place-led City regeneration. This	Noted.

	<p>includes the Green Blue Networking project, which incorporates a SFRA (with input from CEC, Scottish Water, Dynamic Coasts and SEPA as partners).</p> <p>Work on the SFRA is underway. The SFRA is linked to work commissioned by Atkins on Edinburgh’s water environment. The outputs of this work will inform, for instance, the development of site briefs, the context for individual FRAs required of developers, in areas of potential flood risk and the development of green-blue infrastructure throughout the city. Future work should look further at connectivity across blue and green space that maximises benefits for people and eco systems while maximising climate resilience.</p> <p>Consideration should be given to the UK Water Efficiency Strategy once published in influencing the City Plan Action Programme, masterplans/project briefs etc at all scales including the hyperlocal scale.</p> <p>Integration of blue-green infrastructure at all scales is crucial to future adaption. Regional interplay is important, as water catchments straddle authority boundaries. The role of the Strategic Drainage Partnership is to make decisions whilst maintaining an overview of all the existing and proposed work with Edinburgh and Lothians that relates to water issues. This ensures work streams are coordinated, creating efficiencies, learning and added value.</p> <p>SEPA’s current advice may change in line with future publication of NPF4. Strongly recommend for allocations where a FRA is advised as a site requirement, climate change is assessed (40% as required by CEC) and the developable area is considered in line with 1 in 200 year plus climate change flood event.</p>	
SEPA	<p>Work between CEC and its partners on strategic drainage solutions inform the Proposed Plan and this work is being developed to inform the development of proposals and site briefs. It should also be seen as implementing Edinburgh’s ‘Water Vision’.</p>	Noted.
SEPA	<p>The Scottish Government has published its new air quality strategy (Cleaner Air for Scotland 2). The CP2030 is well aligned with the Scottish Government’s position on the role of placemaking in improving air quality. Also note that sustainable</p>	Noted.

	transport hierarchy as outlined in the National Transport Strategy 2 has been embedded in site selection and appraisal process and inform the spatial strategy.	
SEPA	The cumulative internal impacts of policies on air and climatic factors is deemed negative. New development can increase vehicle trips if planned and located in places which make unsustainable travel the most viable option. The policies assessed in the ER indicate far more positive impacts on air quality than negative. The cumulative impact assessment does not adequately reflect this high ambition from the Council.	Noted. However, it is important that the ER report acknowledges the fact that existing air quality in parts of Edinburgh exceeds maximum permitted levels. The strategy of the Plan and the City Mobility Plan will help to address these issues through various mitigation measures including the new low emissions zone.
SEPA	The Cleaner Air for Scotland strategy should be referenced in Appendix 1 as relevant to the ER, perhaps through the Post-Adoption Statement, the City Mobility Plan and in the Action Programme for the CP2030.	Agreed. Text added
SEPA	The River Basin Management Plan aims to protect and improve the water environment in places we live to benefit the health and wellbeing of Scotland's people and communities. As part of the RBMP 2021-27 aiming to deliver 51 new river restoration projects working with Local Authorities. CEC can support by maintaining a minimum 20m buffer zone around waterbodies to allow space for rivers. Development in the vicinity of a waterbody should consider reinstating a 20m buffer, and to restore degraded waterbodies as part of developments. Relevant projects in the area include; Burdiehouse Burn, Gogar Burn, Braid Burn, Murray Burn and Water of Leith.	Noted. Policy Env 29 of the Plan requires development to include a buffer zone along the water's edge.
West Craigs Limited & Dunedin Canmore Housing Association (0352)	SEA has ignored the impact that large scale reallocation of industrial land will have on construction waste and embodied carbon emissions. The Savills Embodied Carbon Report identified that emissions associated with construction waste and new build materials are considerable and should be accounted for in any environmental assessment of the brownfield first approach.	Agreed. The Council acknowledges there is likely to be some emissions impacts as a result of demolishing buildings. However, not all buildings are suitable for re-use, are of poor environmental standard and redevelopment provides opportunities

		for more environmentally efficient buildings with higher densities and lower space heating requirement, which will improve emissions over the longer term. Policies ENV7 and ENV8 are to ensure new buildings are as good as they can be and seek to address these issues. The site assessments have been amended to recognise the embodied carbon emissions generated by the demolition of existing buildings and reference to mitigation has been added.
Barratt David Wison Homes (0677)	There is no assessment of the environmental impacts of, firstly, the embodied carbon release as a result of demolition/renovation of the existing buildings, nor secondly, the consequences of business relocation more broadly in terms of the displacement of communities, increased travelling times for businesses that relocate in more peripheral areas, etc.	Agreed. Response to embodied carbon is set out above.
Mike Richardson (0109)	A lot of emphasis on Flora and Fauna, but no mention of Fungi, as far as I can see. Fungi are a third, and vitally important, Kingdom of living organisms. The majority of plants rely on a relationship with fungi to survive. No Fungi, no Plants; no Plants, no Animals; no animals, no Us. In addition, Fungi are essential in recycling processes - without Fungi, and bacteria and invertebrate, there would be no decay, so nutrients would become locked-up and unavailable for reuse.	Noted. The Environmental Report sets out the results of a Strategic Environmental Assessment of the Plan and its content. Question B1 in Table 4, which sets out the methodology for assessing the policies in the CP2030, asks the following, “Would the policy protect and or enhance Biodiversity?” The Council considers fungi is an integral part of good biodiversity

		and as a result although is not specifically referred to in the wording of the question, is implicit in the question.
Scott Shanks (0648)	In Environmental Report page 65, the SEA policy assessment for Place-based policies 'Edinburgh Waterfront' states that: ' There is not anticipated to be any significant environmental impacts from the development principles but there may be minor benefits but the level of impact is unknown.' The associated table shows Neutral/ No Significant effect on any of the biodiversity (B1 to B5) cells of the table. This is surprising considering the proximity of the Firth of Forth SPA and the Imperial Dock Lock SPA to developments in this area. It appears that the SPAs have not been appropriately considered in this instance. Surely B1 (International Sites protected or enhanced) should be amber here.	Noted. The SEA in this table is assessing the terms of Policy Place 4. As stated, the detailed impacts of the development of the site are set out in the individual site assessment.
Miller Homes Limited (0649) & Miller Homes Limited and Wheatlands Farming Partnership (0592)	<p>The Proposed LDP is supported by an updated Environmental Report which ...focuses on the environmental effects resulting from new policies and proposals in the Proposed Plan. The updated Environmental Report states that following the consultation period on the MIR ...all representations were considered and work on the Proposed Plan was progressed.</p> <p>The Environmental Report has been updated from the Report presented at the MIR stage. The updated Environmental Report provides a summary of the changes made from the MIR to the Proposed Plan stage. This includes a summary of the 16 choices that were set out in the MIR including Choice 12: Building our new homes and infrastructure.</p> <p>The updated Environmental Report confirms that the Council has progressed with Option 1 of choice 12 of the MIR and states that ...the preferred approach has been taken forward... with ...no green belt release.</p> <p>In dismissing all greenfield sites as viable options for residential development, the updated Environmental Report states that ...Greenfield sites are likely to have greater impacts and although some of this can be mitigated through the provision of new infrastructure the longer commuter distances means there is a</p>	Noted. The Council's housing study identified sites south of Gilmerton as a preferred area, should it have been necessary to identify additional greenfield land for housing development. As a result, this area was identified as a choice in Choices for City Plan 2030 (MIR). The Council is required to carry out a strategic environmental assessment of the Plan in accord with the requirements of the Environmental Assessment (Scotland) Act 2005. The purpose of the assessment is to identify the significant environmental effects of the Plan

	<p>potential risk of additional vehicle trips and associated impacts even with mitigation.</p> <p>The updated Environmental Report, therefore, only provides an assessment of all the policies and proposals set out within the Proposed LDP. The Council has not undertaken any updated assessments of greenfield sites promoted through the MIR process for housing led development. The updated Environmental Report, therefore, has failed to evidence that the Council has considered all representations made to the MIR.</p> <p>A representation to the MIR process was submitted in support of a site at South of Lang Loan.</p> <p>The representation raised several concerns with the Council's preferred approach for housing development set out within the MIR. This approach now promoted by the Council within the Proposed LDP proposes that only deemed brownfield sites within the urban area are to be allocated for housing development.</p> <p>The representation highlighted the limitations within the Council's Site Assessment methodology set out in the Environmental Report presented at the MIR stage. These limitations included the Council's methodology ignoring the benefits which would be delivered by the proposed development of a site. The Council's approach was only focused on the environmental and other characteristics of the site at present and not how a potential development can mitigate or avoid impacts on the site's intrinsic characteristics. The Council's approach should have been improved to assist its use as a validation tool for selecting a site for future development.</p> <p>The Council's current rating system also failed to account for the beneficial impacts that the development of a site may deliver through mitigation or improvements. For example, the Council's Site Assessment did not consider a site's proposal and how it can address the requirements set by the Council in terms of its master planning principles.</p> <p>The Council's rating system also did not allow a comparison to be made against other sites being considered for potential development. It was therefore unclear how the Council intended to confidently identify which sites should be brought</p>	<p>and to identify mitigation to seek to offset any impacts that cannot be avoided. As a result, it comprises an assessment of the content of the Plan as published. At the Main Issues Report stage (Choices for CP2030), the sites to the south of Gilmerton were assessed in accord with the methodology set out in the Environmental Report. However, as the Council took a decision at the Proposed Plan stage to not include any additional greenfield sites, including land south of Gilmerton, there was no requirement to include or update these assessments in the revised Environmental Report.</p>
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	<p>forward for allocation within the emerging City Plan 2030.</p> <p>Appendix 7 of the updated Environmental Report provides a summary of comments made on the Environmental Report presented at the MIR stage. Appendix 7 of the updated Environmental Report includes Council’s response to the concerns raised as part of the MIR process.</p> <p>The Council’s response states that the purpose of the Environmental Report ...is to assess the significant environmental impacts of the choices and site options within the Main Issues Report. The Council’s response states that this ...information will be used to inform the preparation of the Proposed Plan. The Council’s response also states that the finalised Environmental Report ...will be updated to take cognisance of any further information available as part of the process of preparing the Proposed Plan.</p> <p>The Council has not evidenced that it has updated the Environmental Report to take account of ...any further information available. The updated Environmental Report does not provide updated assessments of any of the greenfield sites identified at the MIR stage or take account of the information provided in support of the allocation of land at South of Lang Loan for a housing led development.</p> <p>The Council’s updated Environmental Report simply dismisses the merits of all greenfield sites promoted as part of the MIR consultation process with no consideration of the benefits that can be delivered through the allocation of these sites.</p> <p>The Council’s Environmental Report should be updated to demonstrate that it has considered the merits of greenfield sites for housing development such as the site at South of Lang Loan. This should include consideration of the Site Assessment Review, Development Framework Report and Indicative Development Framework submitted by Miller Homes in support of the allocation of South of Lang Loan.</p>	
Elizabeth M Kungu (0063)	Comments re developments in group 18, but could apply throughout. Main concern is that although there are many positive comments concerning enhancing biodiversity and retaining mature trees of the proposed development sites, will these actually be translated into appropriate relevant action once the developers plans are submitted, or	Noted. The Proposed Plan includes a series of place policies which set out development principles covering matters such as this. Development

	<p>in the interests of development, will these mitigation proposals as has happened so often in the past, be watered down, omitted, disregarded, or quietly forgotten about in the interests of greater profits for the developers? What assurance is there that these mitigating proposals will actually be turned into meaningful action on the ground?</p>	<p>proposals will be expected to conform with the requirements set out in place policies. Failure to do so will mean the proposals are contrary to CP2030.</p>
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City Plan 2030

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