

## Local Development Plan: Main Issues Report

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**Planning Committee**  
**6 October 2011**

### **1 Purpose of report**

- 1.1 To invite the Committee to approve for consultation the Edinburgh Local Development Plan's Main Issues Report.

### **2 Summary**

- 2.1 Councils have to prepare local development plans (LDPs) for the whole of their area. A Main Issues Report for the Edinburgh Local Development Plan has been prepared and approval is sought to consult on it with the public, key agencies and stakeholders.
- 2.2 The MIR sets out six main issues covering housing, infrastructure provision, economic growth, shopping and leisure, quality of place and climate change and environmental resources. In each case, preferred options, reasonable alternatives and other options are presented. A three-month consultation period is proposed, running from the end of October to late January. This will be the main opportunity to engage the city's population and other stakeholders.
- 2.3 The MIR is supported by a Monitoring Statement that forms the plan's main evidence base, and an Environmental Report which assesses options.

### **3 Main report**

#### **Background**

- 3.1 Councils have to prepare local development plans (LDPs) for the whole of their areas. This is a requirement of the modernisation of the planning system arising from the 2006 Planning (Scotland) Act. LDPs will replace local plans, in this case the Edinburgh City Local Plan (ECLP, 2010) and the Rural West Edinburgh Local Plan (RWELP, 2006 altered 2011).
- 3.2 The Planning Committee noted a report on development plan progress in September 2010 which outlined the intention to prepare a single LDP for the whole Council area and to closely follow the preparation of the strategic development plan (SDP) for South East Scotland.

3.3 The Council published its latest Development Plan Scheme in March 2011. This set out the LDP timetable as follows:

- October 2011 Publish Main Issues Report (MIR) for consultation
- September 2012 Publish Proposed Plan for representations
- July 2013 Submit Proposed Plan to Scottish Ministers
- 2013-2014 Examination
- End 2014 Adoption

3.4 This timetable seeks to ensure that the Council has plans which are up-to-date i.e. no more than five years old. The time estimates in the later stages are based on those in the relevant government circular. The LDP programme is also linked to SDP progress: the Council cannot submit the Proposed LDP to ministers before they have approved the SDP.

3.5 The LDP will cover a 10 year period, and should be replaced by a second LDP within five years.

#### **Main Issues Report**

3.6 The MIR is ready on schedule. Its text is attached as Appendix 1. The appendix includes the principal illustrations. The published document will also include photographs and several maps which show some of the spatial implications of the options set out in the MIR.

3.7 The purpose and content of a MIR is as follows:

- It is the main consultation stage for the preparation of the LDP. By the time the Council publishes the Proposed Plan it will have reached a settled position on matters and will not be seeking further views.
- The MIR is not a draft plan and does not need to cover all important planning matters.
- It focuses on the main changes which need to be considered when moving from the existing plan(s) to the new plan.
- The MIR should be published before the Council has reached a firm view on matters. It should set out options to which the Council is not yet committed and from which choices can be made following consultation.
- MIRs should be engaging documents which encourage people to read and respond to them.

3.8 A main issue is one where change is needed and there is a choice of how to do so. For example, there may be a need to change policies, proposals or designations if they:

- are not helping to meet objectives;
- have been overtaken by changes in the plan area or the wider world; or
- no longer fit with planning policies or land requirements set at a city-region (by the SDP) or national level (including National Planning Framework and Scottish Planning Policy).

- 3.9 Many of the policies, proposals and designations in the existing ECLP and RWELP are still relevant. The LDP will be based on the ECLP approach as it has been prepared more recently. Where existing policies are working well, no change is suggested.
- 3.10 The MIR sets out preferred options, reasonable alternatives, and, in some cases, other options. They are included for transparency and completeness with an explanation of why they are not currently reasonable, for example, because they would not conform to national or SDP policy.
- 3.11 The MIR is written for a wide audience. It is supported by two documents which are necessarily more technical, but which have been made as accessible and visually interesting as possible. These are the Monitoring Statement and the Environmental Report. They have been placed in the Group Rooms.

#### **Monitoring Statement**

- 3.12 The Monitoring Statement is part of the evidence base for the MIR. It is a statutory requirement. The Statement:
- identifies the key physical, social, economic and environmental changes in the Council's area;
  - assesses the effectiveness of current local plan policies; and
  - provides an information base to help assess the performance of the LDP in future.
- 3.13 In particular, it helps identify where policies and designations need to change and where they do not.
- 3.14 The Monitoring Statement will be updated at regular intervals.

#### **Environmental Report**

- 3.15 The Environmental Report:
- identifies and evaluates the likely significant environmental effects of the preferred options and their reasonable alternatives; and
  - considers the potential environmental effects of the new preferred and reasonable sites in the MIR.
- 3.16 It has been prepared with input from the three national SEA agencies (SNH, SEPA, Historic Scotland). The Environmental Report includes the assessment work that informs the MIR, in particular an assessment of land to meet the strategic housing requirement described below. Potential new housing sites have been assessed against an additional set of determining housing site criteria, as well as the SEA criteria.
- 3.17 The Environmental Report proposes recommendations for mitigation and enhancement measures to prevent, reduce or offset adverse impacts, and to enhance positive effects that are predicted to arise from the implementation of the LDP.

## **Aims and Main Issues**

3.18 The second chapter of the MIR sets out the main priorities for the new Plan. The Plan will focus on the issues that matter most to the people who live, work, and spend their leisure time in Edinburgh. The MIR proposes that the LDP will have the following aims:

- support the growth of the City economy;
- help increase the number and improve the quality of new homes being built in Edinburgh;
- help ensure that the citizens of Edinburgh can get around easily by sustainable transport modes and can access jobs and services by these means;
- look after and improve our environment for future generations in a changing climate; and
- help create sustainable communities, enabling all residents to enjoy a high quality of life.

3.19 To meet these aims it is necessary to address six main issues which are summarised below. In these, the choices the Council must make are focused into 20 questions.

### *Housing*

3.20 The Proposed SDP identifies housing land requirements for the wider city region. In the case of Edinburgh, it requires the LDP to identify land for 2,000 homes in West Edinburgh, and 1,000 homes in South East Edinburgh. The SDP's spatial strategy makes these allocations in two strategic development areas.

3.21 The MIR sets out a range of preferred options and reasonable alternatives for sites which could provide the necessary housing. These have been identified through a detailed assessment of available land within the strategic development areas. That assessment is set out in the Environmental Report. It used criteria based on national planning policy on housing land and green belts.

3.22 The MIR also asks questions on:

- potential for housing on greenfield sites outwith the two strategic development areas;
- how the LDP should support development on housing land within the existing urban areas; and
- whether the LDP should retain a planning policy seeking to control houses in multiple occupation.

3.23 This section also sets out a major choice: whether to retain current policies which designate Leith Docks as an area of housing-led, mixed use redevelopment, or whether to redesignate the bulk of the docks for industry. The implications of this choice are outlined in the MIR.

3.24 This section also presents for discussion four sites in the urban area which have been identified as potential opportunities for new housing as part of wider housing and environmental improvements on Council-owned land.

3.25 The other five sections on the main issues are as follows:

- *Infrastructure Provision* - raises the question of how far development can pay for the infrastructure needed for the city to grow sustainably.
- *Economic Growth* – proposes changes to policy on strategic office locations and provision of small business space in new developments.
- *Shopping and Leisure* – sets out the Council’s priorities for new retail development and proposes changes to policy on alternative uses on Princes Street and elsewhere in the city centre. It also proposes a major change to policy on town centres, leading to the creation of separate supplementary guidance for each centre.
- *Quality of Place* – identifies options for removing sites from the Green Belt because they are occupied by non-conforming uses, for example the airport. This section also sets out options for how the LDP implements the Central Scotland Green Network project and supports local centres.
- *Climate Change and Environmental Resources* – sets out proposed changes to policy on sustainable building design and waste management facilities.

3.26 A further section rounds up other possible changes to policies or designations which are relatively minor or where the options for how to make the change are limited.

3.27 This is followed by a section showing the spatial implications of the main issues on a series of large maps.

### **Participation**

3.28 As well as the monitoring and assessment work referred to above, the MIR has been informed by early engagement as follows:

- meetings with national and regional statutory agencies (Scottish Government, Historic Scotland, Scottish Natural Heritage, Scottish Environment Protection Agency, Scottish Water, Scottish Enterprise, Transport Scotland, SEStran, SportScotland);
- meetings with the other SDP Councils;
- seminars on office development, small business needs and waste management;
- a meeting with house builders arranged by Homes for Scotland;
- input from relevant Council services and departments; and
- two meetings of the City Planning and Development Board.

3.29 The MIR is also informed by the findings of the Edinburgh Residents Survey and the annual neighbourhood surveys, as well as the priorities set in other Council strategies, including the Local Transport Strategy, City Housing Strategy and Economic Review.

- 3.30 It is intended to carry out major public consultation on the MIR for three months, from the end of October to the end of January 2011. This is a longer period than normal, to allow for the Christmas period.
- 3.31 An interim participation programme is attached as Appendix 2. Details of venues and dates for events will be publicised when the consultation is launched at the end of October. The interim programme sets out:
- statutory minimum requirements;
  - commitments made in the current Development Plan Scheme;
  - other measures which are being arranged.
- 3.32 The project website will be updated with further details as events are confirmed.

#### **4 Financial Implications**

- 4.1 There are no direct financial implications arising from this report. Costs associated with the preparation of the local development plan will be met within the Department's existing budget.

#### **5 Equalities Impact**

- 5.1 The changes to policy raised in the MIR may have implications for statutory equalities groups. These will be assessed by ensuring that these groups are engaged in the consultation process described above.

#### **6 Environmental Impact**

- 6.1 The Main Issues Report is accompanied by an Environmental Report which sets out the findings of a strategic environmental assessment. A habitats regulations assessment may need to be carried out at the Proposed Plan stage if any part of the Plan is likely to have a significant effect on European Protected sites.

#### **7 Recommendations**

- 7.1 It is recommended that the Committee:
- a) approves the Main Issues Report for consultation purposes, subject to minor editing (Appendix 1);and
  - b) notes the proposed participation programme (Appendix 2).

**Dave Anderson**  
Director of City Development

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Appendices	1	Main Issues Report
	2	Interim Participation Programme
Contact/tel/Email	Ben Wilson, Principal Planner, 0131 469 3411, ben.wilson@edinburgh.gov.uk Alison Kirkwood, Principal Planner, 0131 469 3590, alison.kirkwood@edinburgh.gov.uk	
Wards affected	All	
Single Outcome Agreement	Supports National Outcome 6 – We live longer, healthier lives.  Supports National Outcome 10 - We live in well-designed, sustainable places where we are able to access the amenities and services we need.  Supports National Outcome 12 – We value and enjoy our built and natural environment and protect it and enhance it for future generations.  Supports National Outcome 14 – We reduce the local and global impact of our consumption and production.  Supports Edinburgh Outcome: Edinburgh’s natural and built environment is supported and enhanced.	
Background Papers	Monitoring Statement, October 2011 Environmental Report, October 2011 Development Plan Scheme, March 2011 Report to Planning Committee, 30 September 2010, Edinburgh Local Development Plan Planning Circular 1/2009 Development Planning	

## CONTENTS

### *FOREWORD*

1.	INTRODUCTION.....	2
2.	PREPARING THE NEW LOCAL DEVELOPMENT PLAN.....	4
3.	HOUSING.....	7
4.	INFRASTRUCTURE PROVISION.....	21
5.	ECONOMIC GROWTH.....	24
6.	SHOPPING AND LEISURE.....	30
7.	QUALITY OF PLACE.....	36
8.	CLIMATE CHANGE AND ENVIRONMENTAL RESOURCES.....	44
9.	OTHER POSSIBLE CHANGES.....	49
10.	SPATIAL IMPLICATIONS.....	55
11.	COMMENTING ON THE MAIN ISSUES REPORT.....	56

### **Abbreviations**

LDP	Local Development Plan
SDP	Strategic Development Plan
MIR	Main Issues Report
MS	Monitoring Statement
ER	Environmental Report
ECLP	Edinburgh City Local Plan
RWELP	Rural West Edinburgh Local Plan
ELSP	Edinburgh and the Lothians Structure Plan
SPP	Scottish Planning Policy
OSS	Open Space Strategy
CSGN	Central Scotland Green Network



## ***FOREWORD***

Edinburgh is a great city. We want to keep it great by building on its strengths and making improvements where we can. (By Edinburgh we mean the urban area, neighbouring towns and villages and the surrounding countryside i.e. everywhere within the City of Edinburgh Council boundary). Our Local Development Plan (LDP) can help. The LDP is a statutory planning document relating to land uses and transport links and focusing on the places where people live, work, study and relax. It will guide the growth of the city, future development proposals, investment decisions and environmental improvements for the next five or so years.

The challenge for this LDP is to help make Edinburgh the best place it can be, for everyone, now and in the future. This is not an easy challenge. We are living in tough economic times when difficult choices have to be made between competing priorities.

In preparing the LDP, we want everyone to have the opportunity to comment on the land use and development issues that affect them. That's the purpose of this Main Issues Report (MIR). Through collaboration and engagement on the MIR, we can all get a better understanding of the key issues and how they affect different people and different parts of the city. This should result in a LDP that best meets the needs of the city and its residents, workers and visitors.

Your views and answers to the questions in the MIR can help shape Edinburgh's first Local Development Plan. Don't miss the opportunity to let us know what is important to you.

***Insert photo***

Councillor Jim Lowrie  
Convenor of the Planning Committee

## 1. INTRODUCTION

- 1.1. There are currently two local plans covering the City of Edinburgh Council area – Rural West Edinburgh Local Plan (RWELP) and the Edinburgh City Local Plan (ECLP). Planning legislation has recently been updated and the Council is now preparing a Local Development Plan (LDP) for its area. The new LDP will be based on a review and update of the existing local plans and, once adopted, (around the end of 2014) will replace them. *(Insert Graphic to show Current ELSP + ECLP (adopted January 2010) + RWELP (adopted June 2006. Alteration adopted June 2011) Will be superseded by Edinburgh and South East Scotland SDP + Edinburgh LDP)*
- 1.2. The Main Issues Report (MIR) is the first stage in the preparation of the Local Development Plan. *(Insert Graphic to show stages in LDP process)*. Its purpose is to seek views on the policy and development options that could be included in the LDP. As its title suggests, the focus is on *main issues* i.e. where change is needed and there is a choice of how to do so. For example, there may be a need to change policies, proposals or designations if they:
- are not helping to meet objectives;
  - have been overtaken by changes in the plan area or the wider world; or
  - no longer fit with planning policies or land requirements set at a city region (by the Strategic Development Plan) or national level (including the National Planning Framework and Scottish Planning Policy).
- 1.3. Many of the policies, proposals and designations in the existing ECLP and RWELP are still relevant. The LDP will generally be based on the ECLP approach as it has been prepared more recently. Where existing policies are working well, no change is needed.
- 1.4. When preparing the LDP, the Council has to act in accordance with the Planning, etc (Scotland) Act 2006 and other relevant legislation, for example, the Climate Change Act and Environmental Assessment Act. The LDP must be consistent with the Strategic Development Plan *(Insert Side box: 'What is a SDP & SESplan?')* and take account of the National Planning Framework. Government policy on planning matters, contained in Scottish Planning Policy (SPP), Circulars, Designing Places, Designing Streets and the West Edinburgh Planning Framework, should also be considered when preparing the LDP. These can all be viewed on the Scottish Government website [www.scotland.gov.uk/Topics/Built-Environment/planning](http://www.scotland.gov.uk/Topics/Built-Environment/planning). Other Council documents also provide a useful starting point for the preparation of the LDP. For example the aspirations of Delivering Capital Growth, the scenarios identified in the preparation of the economic strategy for the city and the opinions expressed in the Edinburgh Residents Survey and Annual Neighbourhood Survey. The LDP also has a role in helping to implement the Edinburgh Partnership's Single Outcome Agreement.

- 1.5. In preparing the MIR, the Council has met with representatives from the key agencies [insert Side box: 'Who are key agencies?'] and other relevant organisations and has held stakeholder workshops on office supply, small businesses and waste management.
- 1.6. The MIR sets out the main areas of change since the existing structure and local plans and considers how these should be addressed in the new LDP. For each of the main issues, it sets out:
  - a preferred option (what the Council thinks would best meet its objectives);
  - at least one reasonable alternative (would also conform to current SDP and govt policy); and
  - in some cases other options (those which are not currently considered reasonable because for example they would not conform to SDP or government policy).
- 1.7. The MIR is structured to make it easy for readers to identify the issues of most interest to them. We hope that this will encourage more people to have their say, helping to shape the future of Edinburgh. The MIR includes a series of questions to help gauge opinions:
  - chapter 2 identifies the main aims for the LDP;
  - chapters 3 – 8 set out the main issues across the LDP area;
  - chapter 9 covers other potential changes to policies or proposals;
  - chapter 10 illustrates what these main issues mean for different parts of the LDP area;
  - Chapter 11 explains how to comment on the MIR.
- 1.8. Two accompanying documents have been prepared to provide more detailed background information. These are:
  - **Monitoring Statement** (MS) which identifies why change is needed and why not; and
  - **Environmental Report** (ER) which assesses the environmental impacts of different options in the MIR.
- 1.9. The MS forms a key part of the evidence base for the LDP and should be read in conjunction with the MIR. It helps explain why issues have been identified as *main* and includes an assessment of the impact of the policies and proposals of the existing local plans.
- 1.10. The ER has been prepared to meet the Council's obligations under the Environmental Assessment (Scotland) Act. The methodology used to assess options to meet strategic housing requirements and the outcomes of this assessment are set out in the ER.
- 1.11. **A Participation and Engagement Statement** has been prepared which sets out how the Council intends to involve people in the LDP and seek views through the MIR consultation process.

## **2. PREPARING THE NEW LOCAL DEVELOPMENT PLAN**

**2.1.** This section sets out what we think are the main priorities for the new Plan. We want Edinburgh to be the best place it can, both now and in the future. The LDP needs to focus on the issues that matter most to the people who live, work, study and spend their leisure time in Edinburgh. To meet this challenge, we think the LDP should aim to:

- 1. Support the growth of the City economy.*
- 2. Help increase the number and improve the quality of new homes being built in Edinburgh.*
- 3. Help ensure that the citizens of Edinburgh can get around easily by sustainable transport modes and can access jobs and services by these means.*
- 4. Look after and improve our environment for future generations in a changing climate.*
- 5. Help create sustainable communities, enabling all residents to enjoy a high quality of life.*

### **AIM 1: Support the growth of the City economy**

**2.2.** Edinburgh's economy has experienced significant growth over the last 10 years, despite the recent recession. This success has been mainly driven by the financial and business services sector. With these areas expected to grow more slowly in coming years, other sectors will become increasingly important in Edinburgh, for example life sciences and renewable energy. The LDP can help Edinburgh to attract new investment and jobs from within Scotland and other countries and to realise its potential for future economic growth.

### **AIM 2: Help increase the number and improve the quality of new homes**

**2.3.** More houses need to be built in Edinburgh to provide homes for people who live or want to live in the city. A key role of the LDP is to identify new land for housing to be built. However, the provision of suitable sites is not the only issue. Limited availability of mortgages and restricted development funding has resulted in a significant reduction in the number of houses currently being built in Edinburgh. The LDP should also address the quality of housing provision. Increasing the number of houses built should not be at the expense of quality design and layout.

### **AIM 3: Sustainable transport and access to jobs and services**

**2.4.** Edinburgh is a compact city with great opportunities for walking and cycling. Most of the area is well served by regular bus services and many communities also have access to the train network. Implementation of the tram, Gogar Inter-modal Station, Glasgow- Edinburgh Rail Improvements, new park and ride facilities and cycle and footpaths as part of the Central Scotland Green Network will increase opportunities for travel by sustainable means. The challenge for the LDP is to ensure new development is directed to locations which can be accessed by public transport, walking and cycling. It also needs to consider the transport impact of development in terms of congestion on existing roads.

#### **AIM 4: Look after and improve our environment**

**2.5.** We need to deliver new development and promote the growth of the city without damaging the environment. A key element of this is how we meet the challenges of climate change, both through mitigation and adaptation. Reducing greenhouse gas emissions from new buildings, minimising flood risk, supporting renewable energy developments where appropriate and supporting the move towards Zero Waste are all relevant considerations for this LDP. Our existing policies which protect Edinburgh's historic and natural environment such as conservation areas, listed buildings, wildlife sites and greenspace will continue to play an important role in the LDP.

#### **AIM 5: Create sustainable communities**

**2.6.** Edinburgh is based on strong, mixed use communities. The majority of residents enjoy a high quality of life with a high standard of housing and easy access to places of work and a wide range of shops, local facilities and greenspace. The LDP should ensure that major new development proposals embrace the principles of sustainable communities and create attractive place with a good mix of uses. The LDP can also help improve the quality of life for residents in more deprived parts of the city by promoting regeneration opportunities where new development can benefit existing communities.

**Question 1: *In considering the future of Edinburgh, what matters most to you? Do you agree with these 5 aims or are there other priorities?*** Please provide a reason for your answer.

To help meet these aims and invite comments on possible changes from the existing plans, we have identified 6 main issues (see chapters 3 - 8). Chapter 9 summarises other potential changes to existing plans which, although important, do not require the same level of explanation and discussion.

<b>1. HOUSING</b> <b>How to help the house-building industry provide additional, good quality housing in Edinburgh across a range of locations, house types and tenures?</b> (relevant to aims 1,2,3,5)
<b>2. INFRASTRUCTURE PROVISION</b> <b>How to provide the infrastructure required for new development and help address existing infrastructure deficiencies in the current economic climate?</b> (relevant to aims 1,2,3,4,5)
<b>3. ECONOMIC GROWTH</b> <b>How to support the continued recovery of the city economy and ensure the economy grows in the most sustainable manner?</b> (relevant to aims 1,2,3,4)
<b>4. SHOPPING and LEISURE</b> <b>How to help Edinburgh City Centre and its network of town and commercial centres fulfil their potential, attracting investment and providing a good mix of high quality shopping and related services for residents, workers and visitors.</b> (relevant to aims 1,3,5)

**5. QUALITY OF PLACE**

**How to create attractive places and provide healthy and safe environments throughout Edinburgh?** (relevant to aims 1,3,4,5)

**6. CLIMATE CHANGE AND ENVIRONMENTAL RESOURCES**

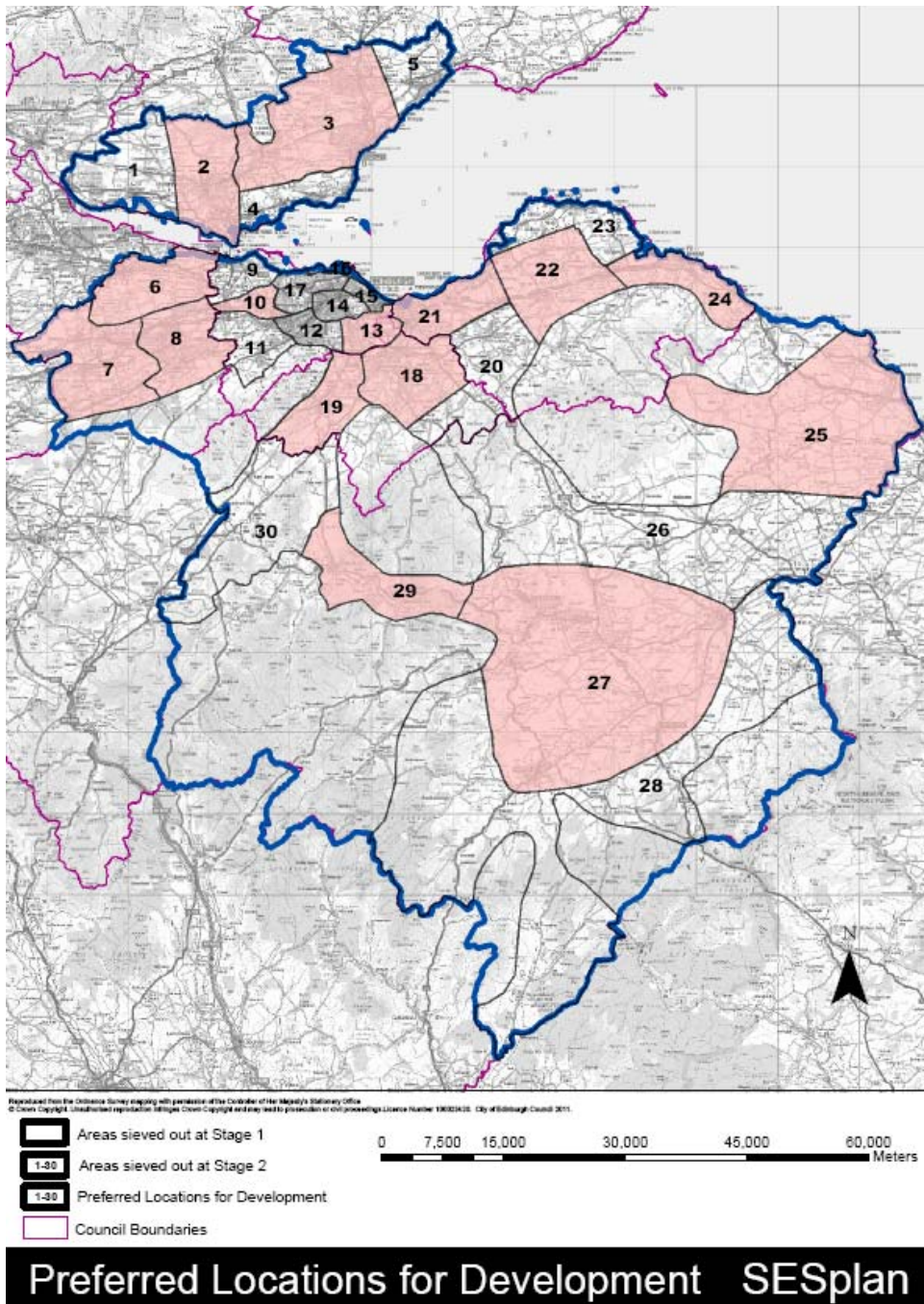
**How best to help reduce greenhouse gas emissions, adapt to a changing climate and address the resource needs of future generations?** (relevant to aims 3,4,5)

### **3. HOUSING**

#### **How to help the house-building industry provide additional housing in Edinburgh across a range of locations, house types and tenures?**

- 3.1.** Housing is an important issue on many different levels. Providing the right types and quality of houses, in the right locations at the right price is important for the well-being of the people who live and want to live in Edinburgh. It also significantly affects the economic success of the city. But housing on its own doesn't create successful places. We also need to consider how new housing relates to the existing transport network, open space provision and local services, whether new infrastructure is needed and the design and layout of housing developments.
- 3.2.** The LDP can't guarantee that houses are built but it can identify suitable sites for the housebuilding industry to provide homes. The recent recession has had a major impact on housebuilding and how we plan for housing in Edinburgh. In the current economic climate, the provision of an adequate housing land supply on its own is not enough to meet housing needs. We need to consider the economic viability of delivering houses on particular sites, both in the short and longer term, and the affordability of the housing that is being provided.
- 3.3.** Edinburgh is home to a large number of students and young people living together in shared accommodation. In preparing this MIR, we have reviewed our existing policies on Student Housing and Houses in Multiple Occupation (HMOs) (MS section 2.1.8). Our monitoring has concluded that local plan policy and accompanying planning guidance on student housing is working well (MS section 2.1.7) No change is therefore proposed. However, our approach to HMOs may need to be revised.
- 3.4.** Government policy requires planning authorities to maintain a 5 year supply of effective housing land for each housing market area to ensure a continuing generous provision of land for house building. Edinburgh forms part of a city-region housing market area. Calculating the housing land supply and identifying the need for additional housing land are therefore important issues for the Strategic Development Plan. In preparing the Strategic Development Plan for Edinburgh and South East Scotland, SESplan undertook a Housing Needs and Demand Assessment in consultation with the Scottish Government and Homes for Scotland, representing the housebuilders. The role of the LDP is to identify sites to meet the housing requirements identified in the SDP.
- 3.5.** Informed by a spatial strategy assessment, the SDP identifies 13 Strategic Development Areas (SDA) as the most sustainable locations for future growth. In Edinburgh, the LDP must allocate land to meet the following SDP requirements:

SDAs	2009-2019	2019-2024
West Edinburgh (Area 10 on map below)	1,000	1,000
South East Edinburgh (Area 13 on map below)	500	500



- 3.6. In identifying these areas for strategic growth, the SDP recognises that green belt land may be needed. It advises that allocations should seek to minimise the loss of land from the green belt whilst balancing the need to achieve sustainability objectives.
- 3.7. The SDP indicates that a further 23,950 houses may be required across the SESplan area in the period 2024 -2032. This requirement will be reviewed through the next SDP and further housing sites allocated through future LDPs.



### **Which sites should be identified to meet the housing requirements set out in the SDP?**

- 3.8.** To conform to the SDP, the LDP must allocate sites for 2,000 houses in West Edinburgh and 1,000 houses in South East Edinburgh. Based on the boundaries identified in the SDP spatial strategy assessment, all potential sites in the West and South East Strategic Development Areas have been assessed. The results of the assessments are included in the ER, which accompanies this MIR. Seven determining criteria have been used to help identify sites suitable for residential development. Criteria relating to whether the site has good accessibility to public transport infrastructure, the impact on the landscape setting of the City and whether clear and defensible green belt boundaries can be formed are of most importance in selecting preferred and reasonable alternatives and therefore have been given greater weight in the assessment.
- 3.9.** Based on the outcomes of these assessments, preferred, reasonable and other options for housing development have been identified. The list of *other options* include sites in West and South East Edinburgh, which scored less well against the assessment criteria and are not currently needed to meet the strategic housing requirements. Large sites outwith South East and West Edinburgh are not reasonable alternatives at this time as these would be contrary to the proposed SDP. However, this may change if the SDP is modified in response to representations. Baseline environmental information for all potential housing locations have therefore been assessed as part of SEA and the outcomes will be used as a basis for considering the suitability of sites, if the SDP context changes.

### **West Edinburgh**

- 3.10.** A total of four sites have been identified under the preferred option providing land for at least 2,000 houses in West Edinburgh. Two of the options are greenfield housing sites which could provide between 800 and 1,120 houses depending on the density of development. It is not possible at this stage to indicate the exact capacity of each potential site. This will require master planning work taking account of the character of the site, place-making objectives etc. For the purposes of the MIR, a range of densities between 25 and 35 units per hectare are presented to assist the consideration of options.
- 3.11.** The other two sites (International Business Gateway and Edinburgh Park) could contribute to strategic housing requirements as part of business-led mixed use allocations. Because this is a new approach to planning for future housing needs in Edinburgh, the preferred option assumes a relatively modest number of units at the IBG (800) and Edinburgh Park (500) up to 2024. This allows for comprehensive master planning and marketing to deliver an integrated approach to housing, business and ancillary development. Promoting housing development in areas previously allocated for business purposes only will bring benefits in terms of quality of place and meeting sustainable development objectives. The LDP will need to ensure that this approach does not result in a overall shortfall in land for business

development. In the case of the IBG, housing development must not undermine the main purpose of the area which is to attract international business investment. The alternative approach identifies a further greenfield housing site to meet the strategic housing requirements for West Edinburgh. Table 6 and Appendix 2 in the ER set out the outcomes of the assessment and explain why the preferred and alternative sites have been selected. The ER also sets out the reasons why other options in West Edinburgh are not considered suitable for housing development at this time. Question 2 focuses on the preferred and alternative sites. However, if anyone wishes to submit comments on any of the other options, your views on these will be considered prior to preparing the LDP.

### Preferred Option

Site Name	Assessment Area within which site is located	Developable Areas (ha)	Potential Capacity (25 -35 units per hectare)
<b>Greenfield Housing Sites</b>			
Maybury 1	West of Turnhouse Road	14	350 - 490
Maybury 2	East of Turnhouse Road	18	450 - 630
<b>Housing as component of Business led Mixed Use Proposal</b>			
International Business Gateway (IBG) 2	International Business Gateway (IBG) 2	n/a	800
Edinburgh Park/Gyle	Edinburgh Park/Gyle	n/a	500
	<b>TOTAL</b>		<b>2,100 – 2,420</b>

This is the preferred option because these sites best meet the assessment criteria (details of the assessment of each site are set out in ER). The benefits of the preferred option are;

- least impact on the landscape setting of the city when viewed from key approaches and rail corridors;
- good accessibility to existing and committed public transport, with considerable weight given to accessibility to Gogar Interchange; and
- promotes sustainable mixed use developments and high quality place-making.

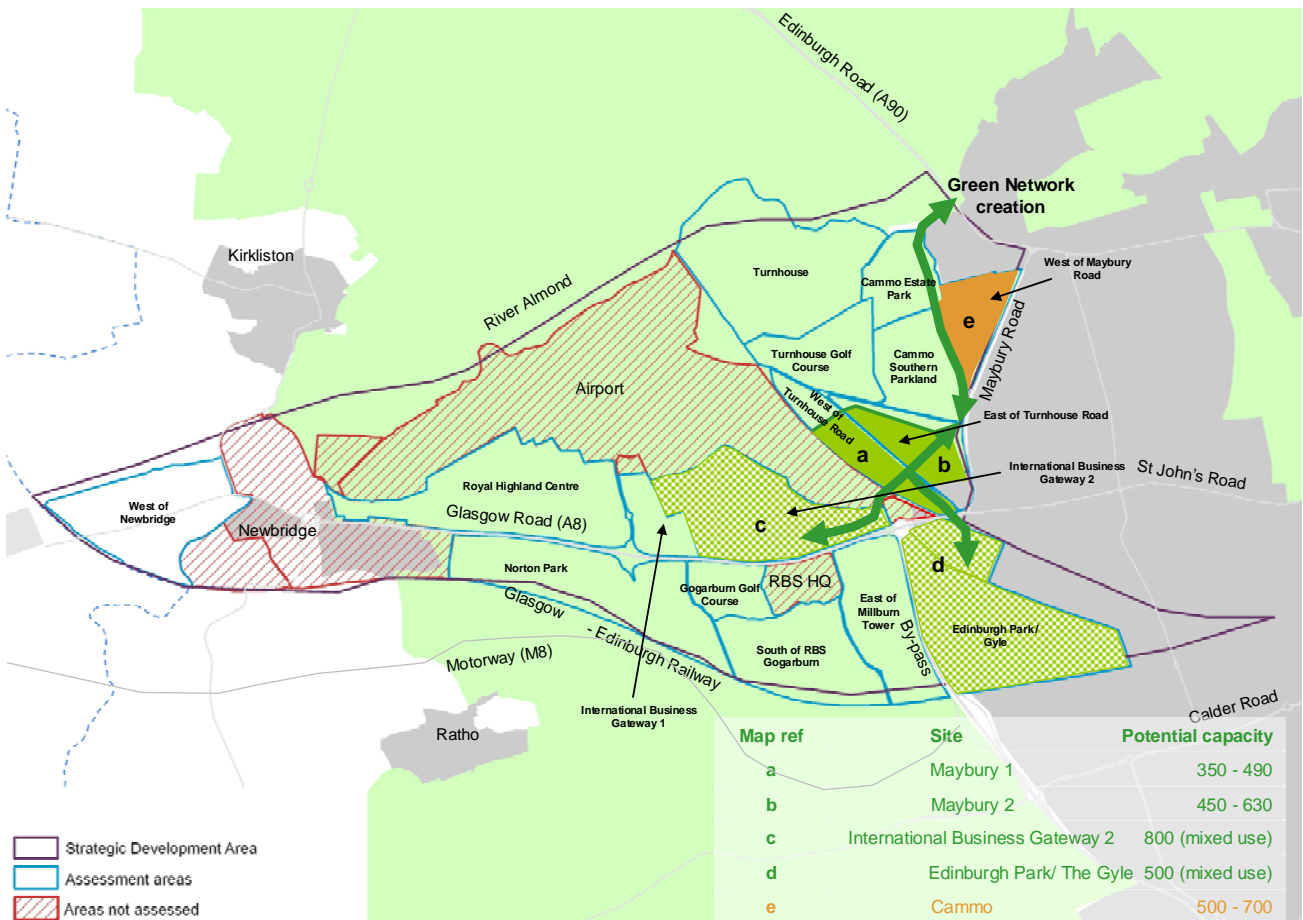
### Reasonable Alternatives

Site Name	Assessment Area within which site is located	Developable Areas (ha)	Potential Capacity (25 -35 units per hectare)
Cammo	West of Maybury Road	20	500 - 700

The reasonable alternative will have limited impact on the landscape setting of the city when viewed from main approach roads. But Maybury Road is a well used local road and currently forms a strong green belt boundary.

## Other Options

Assessment Areas	
Cammo Estate	Royal Highland Centre
Cammo Southern Parkland	South of RBS Gogarburn
East of Millburn Tower	Turnhouse
Gogarburn Golf Course	Turnhouse Golf Course
International Business Gateway 1	West of Newbridge
Norton Park	



**Question 2: Do you agree with the preferred option to meet the requirement for 2,000 houses in West Edinburgh? Or do you support any of the sites listed as reasonable alternatives? Please provide a reason for your answer.**

## South East Edinburgh

- 3.12.** Four sites have been identified under the preferred option providing land for at least 1,000 houses in sites of varying sizes and locations. Any of these sites could be substituted with one or more sites from those listed under the alternative approach provided the total can still deliver 1,000 houses. Two sites at Newcraighall are included in the preferred option but these cannot count against strategic requirement\*\*. Table 7 and appendix 3 in the ER detail the outcomes of the assessment and explains why the preferred and alternative sites have been selected. The ER also sets out the reasons why other options in West Edinburgh are not considered suitable for housing development at this time.
- 3.13.** It is not possible at this stage to indicate the exact capacity of each potential site. This will require master planning work taking account of the character of the site, place-making objectives etc. For the purposes of the MIR, a range of densities between 25 - 35 units per hectare are presented to assist the consideration of options.
- 3.14.** It also sets out the reasons why other options in South East Edinburgh are not considered suitable for housing development at this time. Question 3 focuses on the preferred and alternative sites. However, if anyone wishes to submit comments on any of the other options, your views on these will be considered prior to preparing the LDP.

### Preferred Option

Site Name	Assessment Area within which site is located	Developable Areas (ha)	Potential Capacity (25 -35 units per hectare)
Burdiehouse 2*	East of Burdiehouse Road	10	250 – 350
Gilmerton 1	North of Gilmerton Station Road	2	50 – 70
Gilmerton 2	North of Gilmerton Station Road and South of Gilmerton Station Road	23	575 – 805
Drum 1	Drum north	5	125 – 175
	<b>TOTAL</b>		<b>1,000 – 1,400</b>
Newcraighall 1**	North of Newcraighall Road	9	225 – 315
Newcraighall 2**	South of Newcraighall Road	11	275 – 385
	<b>TOTAL</b>		<b>1,500-2,100</b>

This is the preferred option because these sites best meet the assessment criteria (details of the assessment of each site are set out in the Environmental Report). The benefits of the preferred option are:

- occupy less visually prominent land avoiding main ridges;
- have or have the potential to be contained by landform and/or planting;

- have good public transport accessibility.

insert side box \* Part of the site was granted planning permission for housing by an appeal decision in May 2011 \*\* The 2 sites at Newcraighall performed well against the assessment criteria and can help meet housing need and are therefore included in the preferred option. However, they cannot contribute towards the 1,000 strategic housing requirement because, as previous ECLP sites, they were included in the existing supply (prior to the outcome of a legal challenge). There are planning applications pending determination on both the Newcraighall sites.

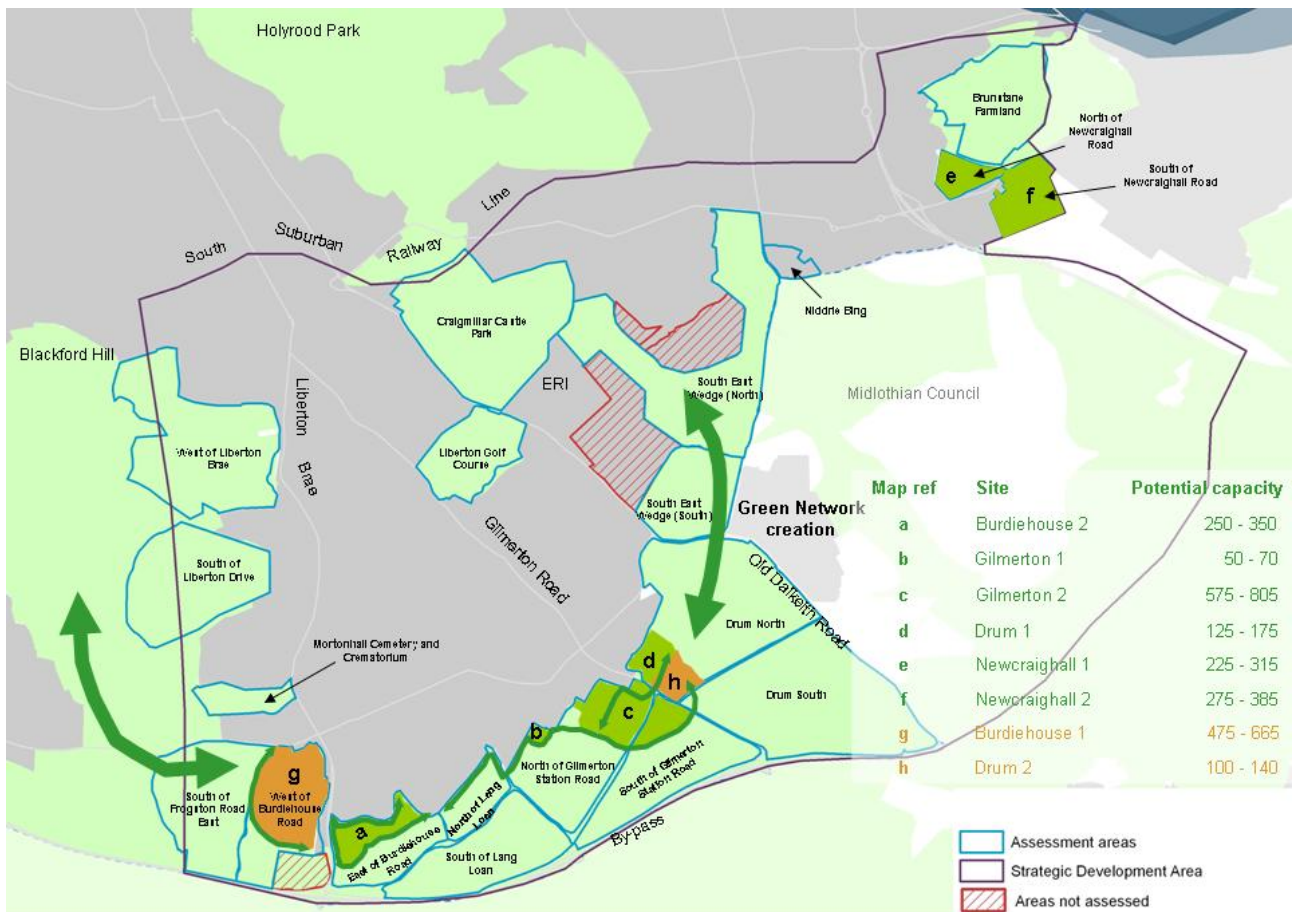
## Reasonable Alternatives

Site Name	Assessment Area within which site is located	Developable Areas (ha)	Potential Capacity (25 -35 units per hectare)
Burdiehouse 1	West of Burdiehouse Road	19	475 – 665
Drum 2	Drum North	4	100 – 140

Burdiehouse 1 generally occupies less visually prominent land but has higher ground in its centre which limits the development potential of the site. Drum 2 would have some impact on a designed landscape and extends the urban area further towards open farmland to the south.

## Other Options

Assessment Areas	
Brunstane Farmland	South East Wedge (North)
Craigmillar Castle Park	South East Wedge (South)
Drum South	South of Frogston Road East
Liberton Golf Course	South of Lang Loan
Mortonhall Cemetery and Crematorium	South of Liberton Drive
Niddrie Bing	West of Liberton Brae
North of Lang Loan	



**Question 3: Do you agree with the sites identified in the preferred option to meet the requirement for 1,000 houses in South East Edinburgh? Or do you support any of the sites listed as reasonable alternatives? Please provide a reason for your answer.**

**What provision should be made for new housing on greenfield sites in areas other than West and South East Edinburgh?**

**3.15.** In addition to the strategic housing allocations in West Edinburgh and South East Edinburgh, the LDP could identify other greenfield housing opportunities, for example to meet local needs or help community regeneration. Such proposals would have to meet the following criteria set out in the SDP:

- development is small scale (maximum of 50 units) and in keeping with the character of the settlement and local area;
- development will not undermine green belt objectives; and
- any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

**3.16.** The approach in existing local plans has generally been to identify only housing proposals on greenfield sites to meet strategic requirements. This focuses development on brownfield sites within the existing built up area and protects the green belt and countryside. However,

one recent exception was a housing proposal on green belt land at Ratho Station identified to help meet community regeneration objectives (proposal HSP5 in Rural West Edinburgh Local Plan Alteration).

- 3.17.** We want to hear the views of different stakeholders on this matter, in particular local residents/community representatives and landowners/developers. Should the LDP continue the current approach of only identifying greenfield sites to meet strategic housing requirements? The implications of this for the LDP would be no new greenfield housing sites outwith West and South East Edinburgh. Or should the LDP identify any small scale greenfield opportunities in other areas? Are there any particular sites that meet the SDP criteria and you think should be identified for housing in the LDP?

#### **Preferred Option**

The LDP should not include any proposals for small scale housing development on greenfield sites outwith West and South East Edinburgh.

This is the preferred option because there is currently no evidence to justify such proposals either to meet local needs or community regeneration benefits.

#### **Reasonable Alternative**

A reasonable alternative would be for the LDP to identify suitable sites.

You are invited to suggest potential greenfield sites for small scale housing development and set out the justification for including them in the LDP in accordance with the SDP criteria outlined above.

**Question 4: Do you agree with the preferred approach to new housing on greenfield sites in areas other than West and South East Edinburgh? Or do you wish to suggest a potential site as an alternative option?** Please provide a reason for your answer.

#### **How should the LDP deal with housing land in the built up areas?**

- 3.18.** The LDP also needs to consider how sites in the existing housing land supply can contribute to meeting housing needs, i.e. sites with planning permission and existing local plan housing proposals. Most of these sites lie within the built up areas of the city or outlying settlements, the remainder being greenfield sites already allocated in existing plans. The SDP is based on implementing approved development plan strategies and took account of the existing housing land supply in its strategic housing requirement calculations. The development of existing sites will therefore play a key role in implementing the SDP and increasing the number of new homes being built in Edinburgh.
- 3.19.** The challenge for this LDP is to consider how best to help the housebuilding industry to deliver new homes on these existing sites. The financial difficulties currently faced by developers and prospective buyers have had a significant detrimental effect on house

completions in Edinburgh (MS section 2.1.3). Across the plan area, there are sites where construction has started and now stopped and sites with planning permission where no development has yet taken place. There is a limit to what the LDP can do to help in such circumstances. However, where relatively high density flatted development was proposed on brownfield sites, LDP support for mid-density schemes with a proportion of houses may help make development viable in the current economic context.

- 3.20.** There are two main options for how the LDP can deal with housing land in the built up areas.

### Preferred Option

- Review existing local plan housing proposals based on the following principles:
  - delete proposals which are complete or likely to be largely complete by 2015;
  - consider whether there is evidence to support the deletion of any other existing housing proposals e.g. because the site is no longer available for housing development or other uses would be appropriate;
  - include all other existing local plan housing proposals; and
  - review site capacities and where appropriate suggest a reduced capacity based on mid-density development.
- Include other large sites (i.e. over 100 units) from established housing land supply as housing proposals.
- Identify any new housing proposals within the built up area  
*LDP policy will protect these sites for housing development. Alternative uses and any significant reduction in capacity would have to be justified.*

This is the preferred option because the implementation of existing sites has a key role to play in meeting housing needs and implementing the SDP strategy. It also supports the house-building industry by revising site capacities to reflect market conditions and promoting a wide range of housing sites available for development in the plan period. (If existing sites do not deliver the number of houses anticipated, the implications for the overall housing land supply will need to be taken into account when the SDP is reviewed).

### Reasonable Alternative

- Review existing local plan housing proposals based on the following principles:
  - only retain proposals which were specifically identified to meet strategic requirements (in previous structure plans);
  - do not include any other existing local plan housing proposals.
- Do not identify any additional housing proposals in the LDP, either from the established housing land supply or any new opportunities in the urban area.

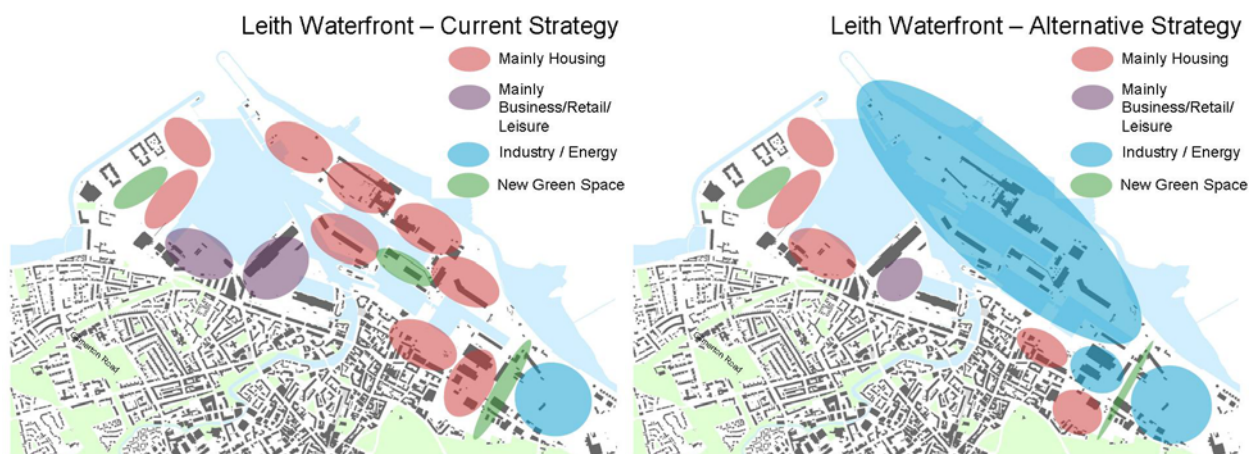


This is a more flexible approach, relying mainly on generic LDP policies to support housing development. The implications of this option would be the deletion of many existing local plan housing proposals. It wouldn't preclude housing being developed on any of the sites identified as proposals under the preferred option. But there would be less certainty regarding the number of homes which would be provided, as sites wouldn't be safeguarded for housing development and could be developed for other purposes. (As with the preferred option, if additional land is required to replace existing sites, this will need to be taken into account when the SDP is reviewed.)

**Question 5: Do you agree with the preferred approach to how the LDP should deal with housing in the built up areas? Or do you support the alternative? Please provide a reason for your answer.**

### Housing Regeneration Proposals

- 3.21. There are two specific housing regeneration matters on which we would like to know your views on at this stage – firstly, in relation to the future use of land at Leith Docks and secondly, potential housing regeneration proposals on four areas of Council-owned open space.
- 3.22. Over 18,000 homes are proposed at Leith Docks as part of existing regeneration plans. These will make a significant contribution to meeting future housing needs over the next 20 to 30 years. It has been assumed that most new homes in Leith Docks will be provided outwith the LDP period, after 2024. However, Scottish Enterprise's National Renewables Infrastructure Plan promotes Leith Docks as a potential location to support Scotland's offshore renewable energy industry through manufacturing and maintenance. In preparing the LDP, we need to decide on the future role of Leith Docks. The plan can either continue to promote Leith Docks as major mixed use regeneration opportunity or it can revert to a business and industry allocation on the majority of the site to accommodate renewable energy developments.



### Preferred Option

Continue to support mixed use regeneration at Leith Docks (see current strategy map above).

This is the preferred option because it recognises the significant long term regeneration potential of Leith Docks and its important role in providing new homes in Edinburgh.

### Reasonable Alternative

Identify north eastern part of site as business and industry area (see blue oval in alternative strategy map above)

This option is supported by Scottish Enterprise's National Renewables Infrastructure Plan. However it has significant implications:

- the SDP includes Leith Docks in the existing housing land supply, with some homes programmed for the period up to 2024. If housing is not provided here, then alternative housing sites will have to be found. The exact amount and location of this replacement supply would be an issue for the next SDP;
- other proposals have been progressing on the assumption that the planned regeneration of Leith Docks would be delivered, for example conditions which allow retail expansion of Ocean Terminal. These proposals will need to be reconsidered if the reasonable alternative is included in the LDP;
- The Firth of Forth is an area of international importance for wildlife. The impact of any changes at Leith Docks on the conservation interests of the Firth of Forth would need to be assessed.

**Question 6 *Do you agree with the preferred option for the future role of Leith Docks? Or do you support the alternative?*** Please provide a reason for your answer.

**3.23.** The Council's regeneration priorities are to ensure that "people live in well designed, resilient, supportive and safe communities with access to services and amenities". To help deliver these priorities, the Council has identified potential investment opportunities for new and improved housing and environmental improvements on Council-owned land. The most significant of these would involve new housing development on existing open space at Moredun, Calders, Clovenstone Drive and Curriemuir End Park (see maps below). These sites can provide much needed new housing with the opportunity to include smaller but better quality areas of open space and play facilities as part of the development or to

upgrade facilities in the wider area. These are included in the MIR to allow local residents and other interested parties to have a say in the future use of these sites.



### Preferred Option

Include these four sites as housing proposals in LDP.

### Reasonable Alternative

Retain the sites as existing open space and if future proposals come forward these will be assessed against plan policies.

**Question 7** *Do you agree with the preferred option for the 4 potential housing regeneration sites on existing open space? Or do you support the alternative?* Please provide a reason for your answer.

**3.24.** Throughout the urban area, other developments will come forward during the plan period. Some of these we can anticipate at this time, for example future redevelopment proposals at Redford and Dreghorn Barracks, if and when these sites are vacated by the Ministry of Defence. Others we cannot predict. But, in all cases, when planning applications are submitted, these will be assessed taking account of LDP policies and other relevant considerations.

### Should we change the Council's policy on Houses in Multiple Occupation (HMO)?

**3.25.** In Edinburgh, many people, particularly young people and students, live together in shared accommodation (House in Multiple Occupation). This can provide a very effective way of meeting housing need but an over-concentration can impact on the amenity and character of some areas. For the purposes of licensing, a House in Multiple Occupation (HMO) is defined as "the only or principal residence of three or more qualifying persons from three or more families". Most HMOs do not require planning permission but they must have a HMO licence. Planning permission is required where more than five people who do not live as a family propose to share a house or flat. Scottish Government policy allows planning authorities to manage HMO concentrations where these are affecting residential amenity.

This provided the justification for ECLP policy Hou9 which seeks to restrict further HMOs in areas where a large number already exist.

- 3.26.** MS Section 2.1.8 demonstrates that using two different mechanisms (i.e. licensing and planning) to manage HMOs has not been particularly successful. The planning policy is having a negligible impact on the number of HMOs each year across the city. Planning can only control HMOs for over 5 people sharing and very few fall into this category. Over concentration is not used as a justification to refuse a licence and therefore new HMOs (3-5 people sharing) could still be licensed in areas of high concentration.

### **Preferred Option**

Delete Policy Hou 9 and allow HMOs to be managed by the licensing process only.

This is the preferred option because policy HOU9 is not meeting its objective of managing the concentration of HMOs.

### **Reasonable Alternative**

Retain existing policy.

Although the policy is having little influence on the concentration of HMOs, it does provide a means of assessing the larger HMOs (6+ beds).

**Question 8: Do you agree with the preferred approach to Houses in Multiple Occupation? Or do you support the alternative?** Please provide a reason for your answer.

## 4. INFRASTRUCTURE PROVISION

**How to provide the infrastructure required for new development and help address existing infrastructure deficiencies in the current economic climate?**

### **Side Box: What is Infrastructure?**

Define generally and list types- network infrastructure: roads\*, paths\*, public transport measures, water supply\*\*, waste water drainage\*\*, gas and electricity supply\*\*, street lighting\*, schools\*, healthcare\*\* (\*=statutory duty for Council \*\*=statutory duty for others.)

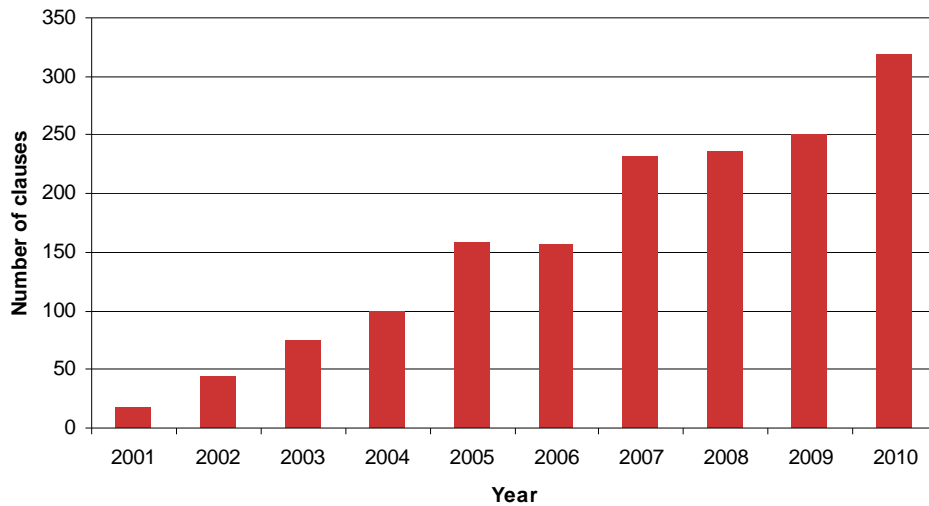
- 4.1. The growth of the city through population changes and housing, business and other development can give rise to the need for a range of additional infrastructure. The LDP will cover two main aspects of infrastructure provision – safeguards and delivery. The provision of green infrastructure such as open space and green networks is dealt with in chapter 7 Quality of Place. Existing policies support the provision of energy infrastructure which may be needed to achieve the greenhouse gas emission reduction targets referred to in chapter 8 Climate Change and Environmental Resources.
- 4.2. The LDP will safeguard land to accommodate the necessary infrastructure required to deliver the strategy of the SDP. This will require changes to existing plans, but is not a main issue as there is no reasonable alternative to meeting the requirement of the SDP on this matter. Information on these strategic infrastructure safeguards and other infrastructure necessary to support development is included in chapter 9.
- 4.3. Scottish Government policy on planning agreements indicates that the development plan should be the point at which consideration of the need for and use of planning agreements should begin. The housing and economic growth identified in the previous and following sections will need new and improved infrastructure. We need to consider how necessary infrastructure provision and improvements associated with new LDP proposals will be delivered. Building on work already undertaken at strategic level, a transport assessment will be undertaken. This will assess the impacts of proposals on transport networks both within and beyond Edinburgh's boundary.

### **How can the LDP help deliver infrastructure provision?**

- 4.4. In the past, much of the infrastructure necessary to support new development was funded through public sector budgets such as the Council, Scottish Government, and Scottish Water. Once occupied, development helped refund that budget through taxes and rates.
- 4.5. The provision of infrastructure for development is now much more complex – with privatised utilities, a choice of providers and a wide range of approaches to funding of infrastructure provision and improvements and connections. For infrastructure provided by the Council, increasing use has been made of legal agreements which require developers to contribute

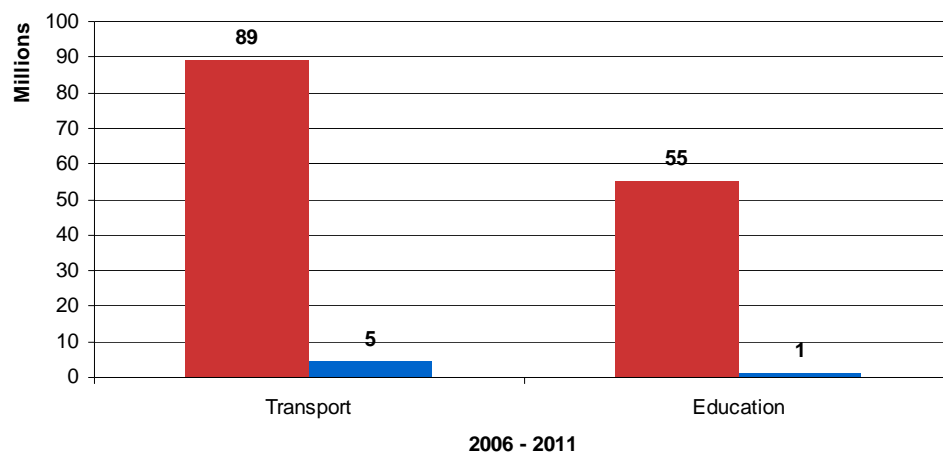
financially towards the cost of providing improved infrastructure where it is needed by their developments.

**No. of developer contribution clauses between 2001 and 2010**



*Number of developer contribution clauses in signed legal agreements 2001-2010*

**4.6.** Edinburgh seeks developer contributions for a wide range of infrastructure measures, for example transport improvements, schools and public realm. A total of £18 million is identified in signed legal agreements up to 2010. Around half has been received, most of which has been spent. However, the graph below shows that these are minor amounts compared to the overall infrastructure costs. It is important to realise that we cannot rely on developer contributions to fund all the infrastructure investment the city needs to grow sustainably.



■ Capital spending (excluding maintenance) on selected infrastructure. Sources of funding; CEC, Scottish Government including SEStran and developer contributions  
 ■ Developer contributions received

**4.7.** Monitoring of existing policies highlights where developer contributions have had the greatest and least impact on infrastructure provision. Before the recession, developer contributions were a widely accepted element of overall development costs. In the current economic climate, the sums involved may be high enough to affect the viability of development schemes. But reducing these contributions is likely to have significant implications. Whilst the Council wants to help make development happen, this should not result in an additional burden on public sector finances or unacceptable impacts on existing infrastructure and services. We also need to consider whether we are spreading developer contributions too thinly over too wide a range of infrastructure requirements.

### **Preferred Option**

Retain current policies which seek contributions to a wide range of measures necessary to make the proposed development acceptable.

Review guidance on developer contributions to reflect current practice through the Council's Economic Resilience Action Plan.

This is the preferred approach because it looks at the cumulative cost of the different requirements and prioritises the essential measures.

### **Reasonable Alternative**

Revise relevant policies and guidance to only require contributions to measures which are absolutely essential to allow development to be built. For example, measures which mitigate significant traffic impact and contributions to schools where an extension is needed.

This approach will help make development happen whilst still providing essential infrastructure. However, it may mean that other measures which make development acceptable, for example public realm improvements, public transport contributions, are not provided.

### **Other Option**

Allow development to proceed without infrastructure improvements.

This option is not supported because it would result in environmental costs, in the form of traffic congestion and increased emissions, and potentially social costs, such as increased distance to schools.

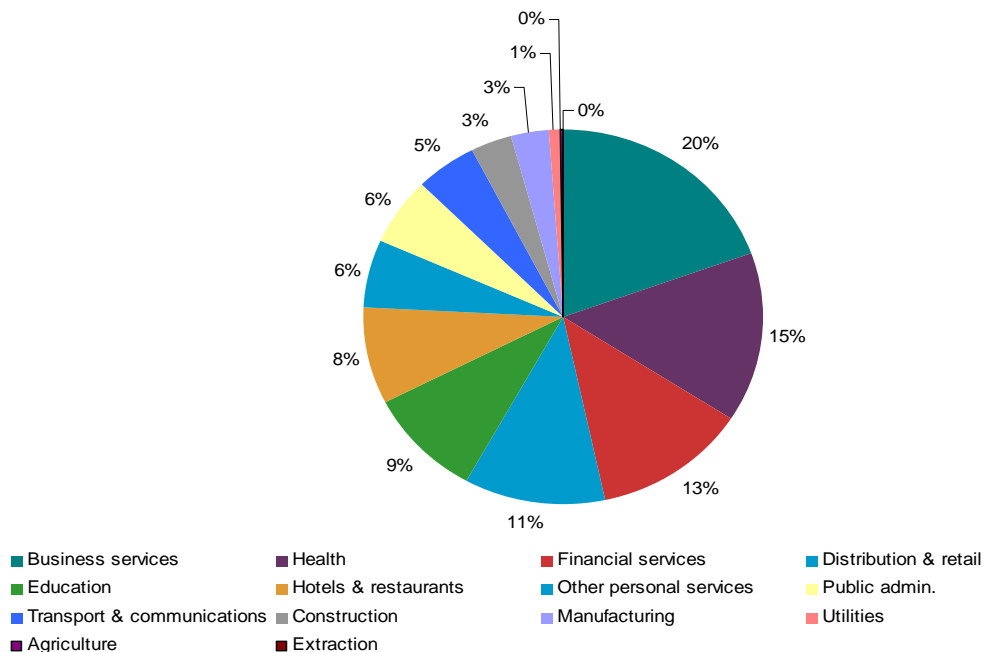
**Question 9: Do you agree with the preferred approach to seeking developer contributions towards infrastructure provision? Or do you support the alternative?** Please provide a reason for your answer.

## 5. ECONOMIC GROWTH

**How to support the continued recovery of the city economy and ensure the economy grows in the most sustainable manner?**

### How well is the city's economy doing?

**5.1.** In recent years, global and national economies have experienced major upheaval but Edinburgh has shown considerable resilience in these difficult times. This resilience is attributed to its mix of jobs and businesses (public sector, financial and business services), skilled workforce and international reputation. Since the end of 2009, the city economy, in line with national trends, has slowly moved out of the recession (MS section 2.2). Edinburgh's economy is predicted to recover well from the downturn, with renewed jobs growth.



*Employment structure in Edinburgh (2010) (Source: Oxford Economics)*

**5.2.** Increasing sustainable economic growth is the overarching purpose of the Scottish Government. The Council has recently started work on the preparation of a new Economic Strategy. The LDP can help deliver the economic strategy, setting out how economic growth priorities can be achieved alongside sustainable development objectives. To grow the economy in the most sustainable manner, the LDP needs to address a range of inter-related issues including business and industrial land supply, housing provision, good transport, particularly public transport infrastructure, support for universities and other education providers, renewable energy and waste management. This section deals



specifically with the business and industrial land supply, with the other related matters covered elsewhere in the MIR.

### Economic Development Priorities

**5.3.** Edinburgh's economic development priorities are to:

- maintain a prosperous and competitive city economy and to direct investment to sustainable locations;
- protect existing industrial and storage areas of importance for a mixed and varied economy; and
- maintain and enhance the diversity of jobs available in the city, paying special attention to small business needs.

**5.4.** To deliver these priorities, Edinburgh needs an employment land supply providing a mix of strategic, general and specialist sites including :

- a range of sizes of offices;
- small business space (including light industrial units); and
- **[Insert Side box: Use classes order – showing permitted changes.]**
- large purpose-built storage and general industrial areas which can also provide for waste management facilities.

### Strategic Employment Land Supply

**5.5.** The SDP requires LDPs to retain the quantity of the established strategic employment land supply across the SESplan area. In Edinburgh, the sites listed in the table below are included in the strategic land supply (Extracted from table in SDP Economy Technical Note). In addition to the strategic sites, we also need to provide a supply of land for office development, general industry and storage and distribution uses. Suggested changes to existing business and industry proposals and allocations are included in chapter 9.

Strategic Site	Site Size (Ha)
St James Quarter	2
Caltongate	1
Quartermile	1
International Business Gateway (IBG)	85
Gogarburn	9
Edinburgh Park	16
Newbridge	64
Waterfront	33
Leith eastern industrial area	20
BioQuarter	40

- 5.6.** The sites at St James Quarter, Caltongate, Quartermile and Waterfront are large mixed use redevelopment projects which include business proposals. The other sites are already covered by business and industry proposals/allocations in existing local plans. Through this MIR, the potential for mixed use areas (with residential and employment opportunities jointly provided) is being considered at the IBG and Edinburgh Park. This is supported by the SDP provided it does not result in a net loss to the overall strategic employment land supply.
- 5.7.** Edinburgh is a growing force in tomorrow's key business sectors such as life sciences where we are developing a world – class cluster of research and development expertise at Edinburgh's Bioquarter next to the Edinburgh Royal Infirmary. The Bioquarter is not an office park. Existing local plan policies and proposals allow for the development and extension of the Bioquarter for education, research and ancillary uses in a form that protects its attractive landscape setting. Assuming these objectives remain, no significant changes are needed to the plan (MS section 2.2.5). The research park at Heriot Watt University also has scope to grow within its existing boundary and therefore no changes to the plan are necessary.
- 5.8.** National Planning Framework 2 and the West Edinburgh Planning Framework recognise the importance of West Edinburgh as a driver of the national economy and high quality gateway to Scotland. In addition to the IBG mentioned above, proposals for West Edinburgh include expansion of the airport and improvement and potential relocation of the Royal Highland Centre. The recently adopted RWELP Alteration provides an up to date policy context for West Edinburgh. Apart from removing these sites from the green belt (see section 7.7), no significant changes are required.
- 5.9.** The National Renewables Infrastructure Plan identifies Leith Docks as a potential location for manufacturing, installation and maintenance of offshore wind infrastructure. Using the docks for this use would require a change to the existing local plan allocation which proposes mixed use development including up to 18,000 houses and flats. Options regarding the future use of Leith Docks are set out in Chapter 4.

#### **How should we plan for and provide office space in Edinburgh?**

- 5.10.** Financial and business services are a key component of the city economy. Whilst attempts are being made to diversify the economy to include a wider mix of business types, providing land for office development is still a main issue for the LDP.
- 5.11.** Existing local plan policy directs major office development (proposals over 1,000 sq.m.) to four strategic business centres at the city centre, Edinburgh Park/South Gyle, Leith, and Granton Waterfront. In addition, the International Business Gateway in West Edinburgh provides the opportunity for major office development for international companies to attract inward investment. Other potential locations (mainly for smaller proposals) are at

Newbridge, other business and industrial areas and other mixed use areas near public transport links.

- 5.12.** The Council has worked with the Edinburgh Business Forum to forecast potential supply and demand of new office floorspace (MS section 2.2.2). There is a shortage of identified new floorspace in the city centre. However, evidence suggests this demand for new floorspace will not always spill over to out-of-centre locations such as South Gyle or Leith. Outwith the city centre, there is available business land with the potential for the floorspace equivalent to over 100 years worth of take-up. We need to consider whether the LDP should continue to safeguard such a large amount of land for office development.
- 5.13.** Chapter 7 of the MIR focuses on quality of place which will help create sustainable communities. One way the LDP can address this issue is to consider mix of uses and how to create attractive places which are well integrated with the rest of city. In the past, offices were often provided in large single use developments which have resulted in parts of the city becoming largely unused outwith working hours. Offices provided as part of mixed use proposals would meet business needs and also deliver better places.

### Preferred Option

- Continue to support the city centre as a strategic office location and introduce a more prescriptive requirement for a minimum amount of office development within large mixed use developments in the city centre.
- Continue to identify Edinburgh Park/South Gyle, Leith and the International Business Gateway (for international businesses) as strategic office locations with other uses supported.
- Delete Granton Waterfront as a strategic office location.
- Allow office development in other locations with scale constrained by public transport accessibility.

This is the preferred option because it seeks to balance the provision of adequate office space with meeting place-making objectives. It seeks to increase office space provision in the city centre where there is a shortfall in supply. It is hoped that creating better places in the out of centre locations will increase their potential to attract investment and jobs. It is proposed to delete Granton as a strategic office location because there is no evidence of demand and accessibility by public transport is better in the other locations. Office use will still be supported in Granton, although proposals are more likely to be on a smaller scale.

### Reasonable Alternative

Retain current policies and designations.

This would mean significant areas of land being held in reserve for office development which may never be built.

## Other Option

Allow major office development to be located anywhere in the urban area or outlying settlements.

This is not supported because, to meet sustainability objectives, major office use should be directed to locations which are well served by public transport.

**Question 10: Do you agree with the preferred approach to planning for and providing office space in Edinburgh? Or do you support the alternative?** Please provide a reason for your answer.

## Small Businesses

- 5.14.** Meeting the needs of small businesses continues to be a challenge in Edinburgh. In reducing the number of protected business and industry areas, the ECLP introduced Policy Emp4. It requires mixed use proposals on employment sites outwith employment and industry areas to include floor space for a range of business users to contribute to the city's stock of flexible small business and industrial premises.
- 5.15.** In 2006, the Council commissioned a design study to investigate innovative methods of integrating small business units into high density mixed use development. [ Insert Sidebox - Illustration from Design Study]
- 5.16.** The 2011 Small Business Study found that the market for small business across the city remains active. However, not much development has come forward (MS section 2.2.3). Policy Emp4 has provided office space within high density, inner city residential developments. But so far it has failed to deliver traditionally flexible units which are suitable to a range of business users including light industrial. In light of this evidence, we need to consider whether any changes should be made to policy Emp4.

## Preferred Option

Retain the requirement for proposals on existing employment sites outwith designated business and industry areas to provide new floorspace for a range of business users. But indicate that this is only applicable on larger sites (for example over 2 ha).

This is the preferred option because it strikes a balance between trying to meet the needs of small businesses but responds to the failure of the existing policy to deliver the type of business space required.

## Reasonable Alternative 1

Delete the requirement for proposals on relevant employment sites to provide new floorspace for a range of business users.

## Reasonable Alternative 2

No change to existing policy - retain the requirement for proposals to provide new floorspace for a range of business users on relevant employment sites.

**Question 11: *Do you agree with the preferred approach to meeting the needs of small businesses? Or do you support one of the alternatives?*** Please provide a reason for your answer.

## 6. SHOPPING and LEISURE

**How to help Edinburgh City Centre and other centres fulfil their potential in attracting investment and providing high quality shopping and related services?**

### Retail provision and trends in Edinburgh

**6.1.** In Edinburgh, shopping and leisure uses are mostly provided in a network of centres across the LDP area. Existing local plans identify the city centre, 9 town centres, 8 commercial centres and 54 local centres. There is no intention to make any significant changes to the network of centres or their boundaries.

#### Network of Shopping Centres

<b>Edinburgh City Centre</b>		
<b>Town Centres (9)</b>		
Corstorphine	Gorgie/Dalry	Leith Central
Leith Walk	Morningside/Bruntsfield	Nicolson Street/Clerk Street
Portobello	Stockbridge	Tollcross
<b>Commercial Centres (8)</b>		
Cameron Toll	Craigleith	Fort Kinnaird
Gyle	Hermiston Gait	Meadowbank
Ocean Terminal	Wester Hailes	
<b>Local Centres (54)</b>		

**6.2.** The ECLP was prepared within a context of significant spending growth, informed by a study of the Edinburgh area's retail needs (EARNs). In recent years, there has been a significant decline in retail spending. Existing forecasts (see MS section 2.2.9.1) show a return to growth in retail spending but at much lower rates. But, given current economic difficulties, it is possible that even a reduced level of growth will prove too optimistic.

**6.3.** National policy states that LDPs should enable gaps in shopping provision to be filled by identifying appropriate locations for new development. The uncertainty in retail spending growth means that there may be fewer or no gaps in the plan period, at least in terms of the quantity of retail provision.

**6.4.** The Council has carried out four major shopping surveys since 1986 (MS section 2.2.9.1). In general, in all centres, there are:

- fewer shop units (comparison and convenience shopping);
- more floorspace (ie bigger units on average);
- more convenience floorspace (ie more supermarkets); and
- more service uses (by number of units and amount of floorspace)

- 6.5. Edinburgh city centre is a world-class destination for tourism (MS section 2.2.6), second only to London as a UK destination for international visitors. Whilst it is the regional centre for shopping, leisure and entertainment, there is room for improvement in its reputation as a shopping destination. This MIR considers how to improve the city centre in terms of the amount of floorspace and mix of uses.
- 6.6. In June 2011, the Council published a report on Edinburgh's Shopping Centres 1986 -2010 which provides useful analysis to inform the LDP. Relevant information on town centres is included in MS Section 2.2.9.4. From 1986-2010, retail floorspace has increased in supermarkets, covered malls and retail parks across the LDP area. However, there has been an overall decline in retail floorspace in Edinburgh's nine town centres. Vacancy rates in the town centres vary from 5.2 - 14.2% which highlights that some centres are performing better than others. In March 2011, the Council approved a Town Centres Strategy. This includes a health check and proposes an action plan for each of the nine centres.
- 6.7. The eight commercial centres in Edinburgh continue to fulfil an important role as shopping/leisure destinations (MS section 2.2.9.6). However, they do not have the diverse mix of uses found in town centres and in most cases accessibility by public transport is not as good. The majority of these centres are performing well, with a good mix of retailers and few vacancies. The one exception is Wester Hailes which has struggled to attract retailers, has many vacant units and where existing local plan proposals for new development have not been implemented.
- 6.8. Ensuring easy access to local shopping centres and supermarkets is an important planning matter. Monitoring suggests that the existing network of local centres and distribution of supermarkets meets the needs of people living and working in the Edinburgh area. A suggested change to the policy on uses in local centres is included in chapter 7. Supermarket provision is covered in chapter 9.

#### **Where should new retail development be located?**

- 6.9. Existing local plan policies support the city centre and nine town centres as the preferred locations for new retail development. The ECLP policies for the city centre were informed by the EARNS study which indicated that an additional 70,000 m<sup>2</sup> retail floorspace could be created in the city centre. The ECLP aims to deliver three-quarters of this figure, i.e. 52,500 m<sup>2</sup>. Support for retail expansion of the commercial centres relies on the city centre achieving its potential, i.e. on course to meet the target of 52,500 m<sup>2</sup>.
- 6.10. In preparing the LDP, we need to consider progress made in terms of delivering new retail floorspace in the city centre. To date, the additional net retail floorspace consented in the city centre is around 28,000 m<sup>2</sup>, of which only 2,600 m<sup>2</sup> is under construction. Through its *String of Pearls* concept and City Centre and Princes Street Development Frameworks, the

Council has been working with other partners to bring forward new and better retail floorspace and environmental improvements in the city centre. This has proved a difficult task. However, some progress has been made, e.g. redevelopment of 91-93 Princes St (Primark) and 121- 123 Princes Street (New Look).

- 6.11.** The proposed redevelopment of the existing St James shopping centre to create the new St James Quarter will deliver a significant increase in shopping floorspace and improve the appearance of the eastern end of the city centre. The implementation of this proposal will make a significant contribution to the future success of Edinburgh city centre as a shopping destination and it is hoped that work will commence in early 2013.
- 6.12.** Delivering new retail development in the city centre is challenging, particularly in current economic conditions. However, a policy framework which promotes and supports Edinburgh city centre's position at the heart of the regional network of shopping centres across the region can help.
- 6.13.** MS section 2.2.9.3 includes an update of the EARNS floorspace capacity figure in the city centre. It suggests that there is capacity for an additional 14,700 m<sup>2</sup> retail floorspace. This figure assumes the implementation of the St James Quarter but may need to be reviewed again if this proposal does not come forward as quickly as planned. We need to consider whether the LDP should include this revised floorspace capacity as part of its overall approach to protecting and promoting the shopping role of the city centre.
- 6.14.** The town centres perform an important role in providing a wide range of shopping and leisure facilities and local services in locations well served by public transport. The policy approach to town centres is supported by the Council's town centres strategy. Action Plans for each centre will identify appropriate measures to build on its strengths and help overcome any weaknesses.
- 6.15.** Directly related to this approach to the city and town centres is the need to manage further growth of the commercial centres and out of centre development. There is not expected to be any significant gap in floorspace provision to justify specific LDP proposals to expand any of the commercial centres. This does not prevent the commercial centres continuing to evolve within existing floorspace limits. The case for expansion of the commercial centres will be reviewed again in 5 years time, through the next LDP.
- 6.16.** The ECLP includes a table setting out the characteristics and role of commercial centres. This will be updated. No change is proposed to the existing policy for assessing proposals for additional floorspace in commercial centres. Consideration will be given to the future role of the Wester Hailes centre, where the quality and quantity of shopping provision is well below that of the other commercial centres. We need to review the existing approach to Wester Hailes and, working with the centre owner and other stakeholders, consider how best to support the centre to meet the needs of the local community.



## New Retail Development

### Preferred Option

- Retain existing sequential approach to locations for new retail development i.e. city centre or town centre first, then commercial centres and then out of centre.
- Continue to promote opportunities for more shopping provision in the city centre.
- Consider future role of Wester Hailes centre.
- No longer include a retail floorspace target for the city centre.
- Not identify any proposals for retail expansion of other commercial centres.

This preferred option continues a well-established approach to retailing in Edinburgh and is supported by SPP and SDP. It is based on an assumption that significant spending growth during the LDP period is unlikely. In this context, specific proposals to expand any of the commercial centres or including a revised floorspace target for the city centre, beyond which expansion of commercial centres could be supported, are not appropriate.

### Reasonable Alternative

We could continue the ECLP approach to protecting and promoting the shopping function of the city centre. This would include a revised retail floorspace capacity in the city centre (for example 14,700 m<sup>2</sup>) as a development target and an indicator of when the city centre is achieving its potential and growth of the commercial centres could be supported.

This approach may not be suitable in a time of reduced spending growth.

### Other Option

Support further growth of the commercial centres.

This option is not supported because of the uncertainty regarding retail spending growth. Any available increase should be directed to the city and town centres in the first instance. Even if there is significant spending growth, the commercial centres have capacity in unimplemented consents to allow them to expand until the next LDP review.

**Question 12: Do you agree with the preferred approach to planning for new retail development? Or do you support the alternative?** Please provide a reason for your answer.

## Alternative Uses in City Centre and Town Centres

**6.17.** The city centre and town centres are not just destinations for shopping. Other uses are important to complement their main retail purpose such as offices, restaurants and community uses and help make the centres vibrant, attractive places. Current policies deal with the balance of uses in the city centre and town centres by defining frontages and setting thresholds for a minimum proportion of units in shop use. Shops are often the main reason why people visit a centre and therefore maintaining a good proportion of units in

shop use helps keep centres busy. In the city centre, the whole of Princes Street is identified as a core frontage where the policy prevents any new non-shop uses. Views have been expressed, including in a Council commissioned study “Public Space Public Life”, that a more diverse mix of uses along Princes Street would benefit the city centre. In particular, allowing such uses into frontages at the western part of the street could complement the increase in shopping floorspace proposed at the eastern end in the St James Quarter.

## Alternative Use of Shop Units – City Centre Core Frontages

### Preferred Option

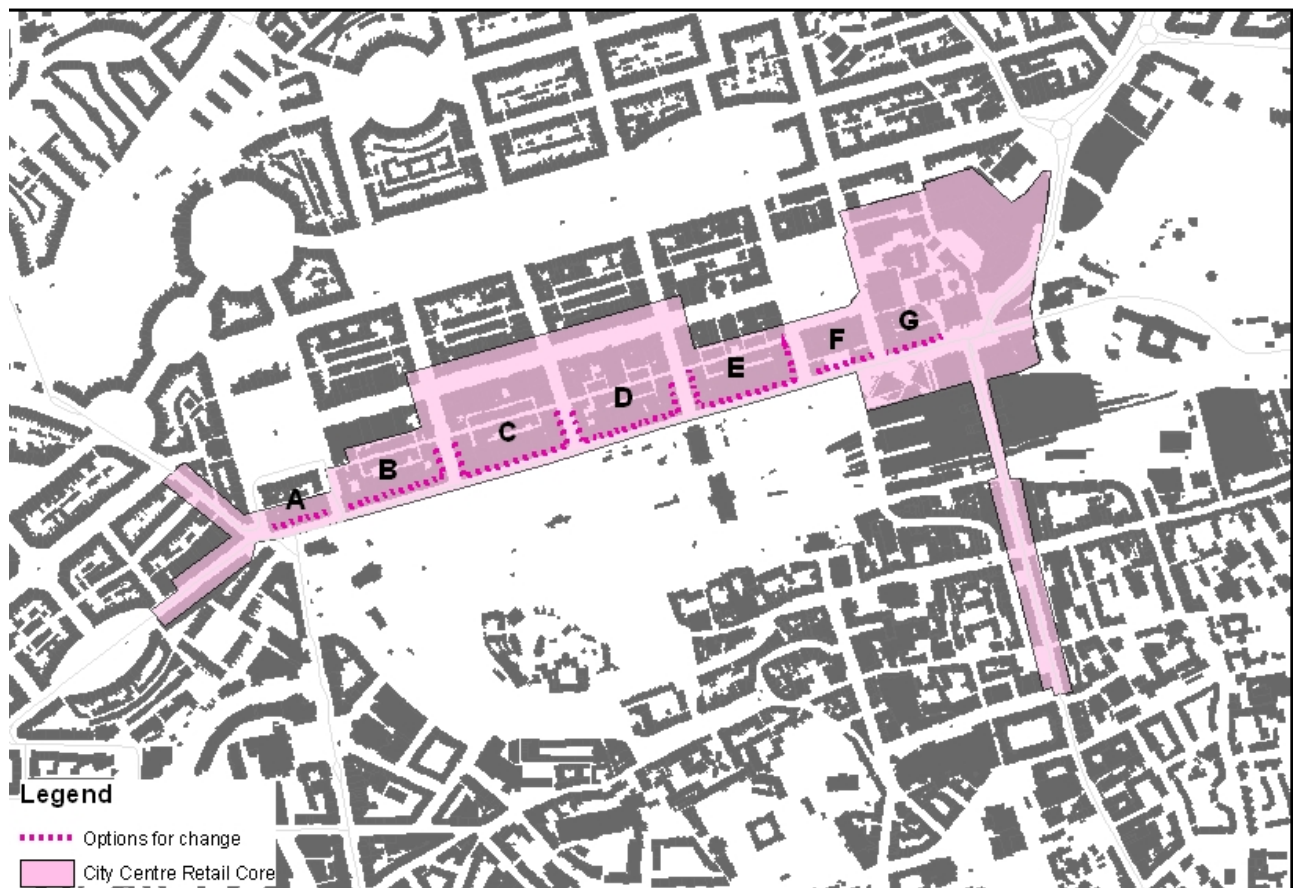
Revise policy to allow a limited proportion of non-shop uses along some or all frontages on Princes Street. The defined frontages and the proportion of non-shops uses allowed in each could be identified in the LDP or alternatively through supplementary guidance for the city centre.

This is the preferred approach because it would allow the introduction of complementary uses to support the main shopping function of Edinburgh’s shopping core.

### Reasonable Alternative

Retain existing policy approach of preventing new non-shop uses in any frontage on Princes Street.

This option would protect as much retail floorspace as possible to strengthen the shopping function of the city centre.



**Question 13: Do you agree with the preferred option to allow some non-shop uses along Princes Street? If so, on which frontages do you think non-shop uses should be allowed (see A – G on map above)? Or do you support the alternative?** Please provide a reason for your answer.

### **Alternative Use of Shop Units – elsewhere in the City Centre and Town Centres**

- 6.18.** In other parts of the city centre and in the nine town centres, existing policies aim to support their shopping function by limiting the number of units in non-shopping use. We need to consider whether these policies should be revised as there are some drawbacks to the current approach. For example, a one-size-fits all policy is applied to all primary frontages in the city centre and the nine town centres regardless of local characteristics or the size and position of individual shop units. Whilst this provides a consistent approach across the plan area, there may be benefits in a policy context which can better adapt to the particular circumstances of each centre.
- 6.19.** An alternative to including policies on uses in town centres in the LDP is to use statutory supplementary guidance. This would allow for more frequent updates, if needed, to better manage the mix of uses in these centres.

### **Preferred Option**

Revise the policy and proposals map to no longer identify primary frontages in the LDP, or set numerical limits on non-shop uses. The appropriate mix of uses in each town centre would instead be considered through supplementary guidance. The policy restricting alternatives to appropriate commercial or community uses would still apply.

This is the preferred option because it allows a more flexible approach to better meet the particular needs and characteristics of each town centre.

### **Reasonable Alternative**

Retain existing policy approach to non-shopping uses in town centre primary frontages.

**Question 14: Do you agree with the preferred approach to non-retail uses in town centres? Or do you support the alternative?** Please provide a reason for your answer.

## 7. QUALITY OF PLACE

### How to create attractive places and provide healthy and safe environments throughout Edinburgh

#### What does “quality of place” mean?

- 7.1. Planning has a role to play in protecting the quality of the environment and in promoting a high standard of development and place-making. The term *quality of place* covers a range of factors such as the design of buildings, safe and attractive streets and open spaces, good footpath and cycle links to local services, historic environment and natural heritage. It is widely recognised that quality of place benefits the economy and influences quality of life. In this context, planning decisions and development on the ground can have significant effect on the health and well-being of Edinburgh’s residents and workers.
- 7.2. The majority of existing policies relating to quality of place are generally working well, for example built and natural heritage, mix of uses, schools and community facilities and accessibility (MS sections 2.1.9, 2.3.3 and 2.3.4) No significant changes are required to these policies.
- 7.3. We intend to make some minor changes to existing local plan policies and proposals to improve our approach to quality of place matters. These are explained in chapter 9. This chapter focuses on 3 main issues where we are seeking comments on possible changes to the approach in existing local plans – the green belt, green networks and local centres.

#### What changes should made to the Green Belt

- 7.4. There has been an Edinburgh Green Belt since 1957. It has three main purposes (as set out in SPP), to:
  - direct planned growth to the most appropriate locations and support regeneration;
  - protect and enhance the quality, character, landscape setting and identity of towns and cities; and
  - protect and give access to open space within and around towns and cities.Green belt is probably the most well known planning designation and its contribution to quality of place in Edinburgh is highly valued. The SDP confirms that the Edinburgh Green Belt should be retained. It is the role of the LDP to identify detailed boundaries of the green belt and identify types of development that are appropriate within it.
- 7.5. Existing local plan policies identify the limited types of development appropriate in the green belt. It is not proposed to make significant changes to this. Guidance on how proposals can meet the requirements of green belt policy will be provided in a consolidated guideline on design and place making. This will replace the existing guideline on development in the green belt and countryside and also cover matters currently dealt with in RWELP policy E6.

## **Green Belt Boundaries**

**7.6.** Existing green belt land is identified in the ECLP and RWELP. No extensions to the green belt are intended. The LDP will need to take land out of the green belt for two main reasons:

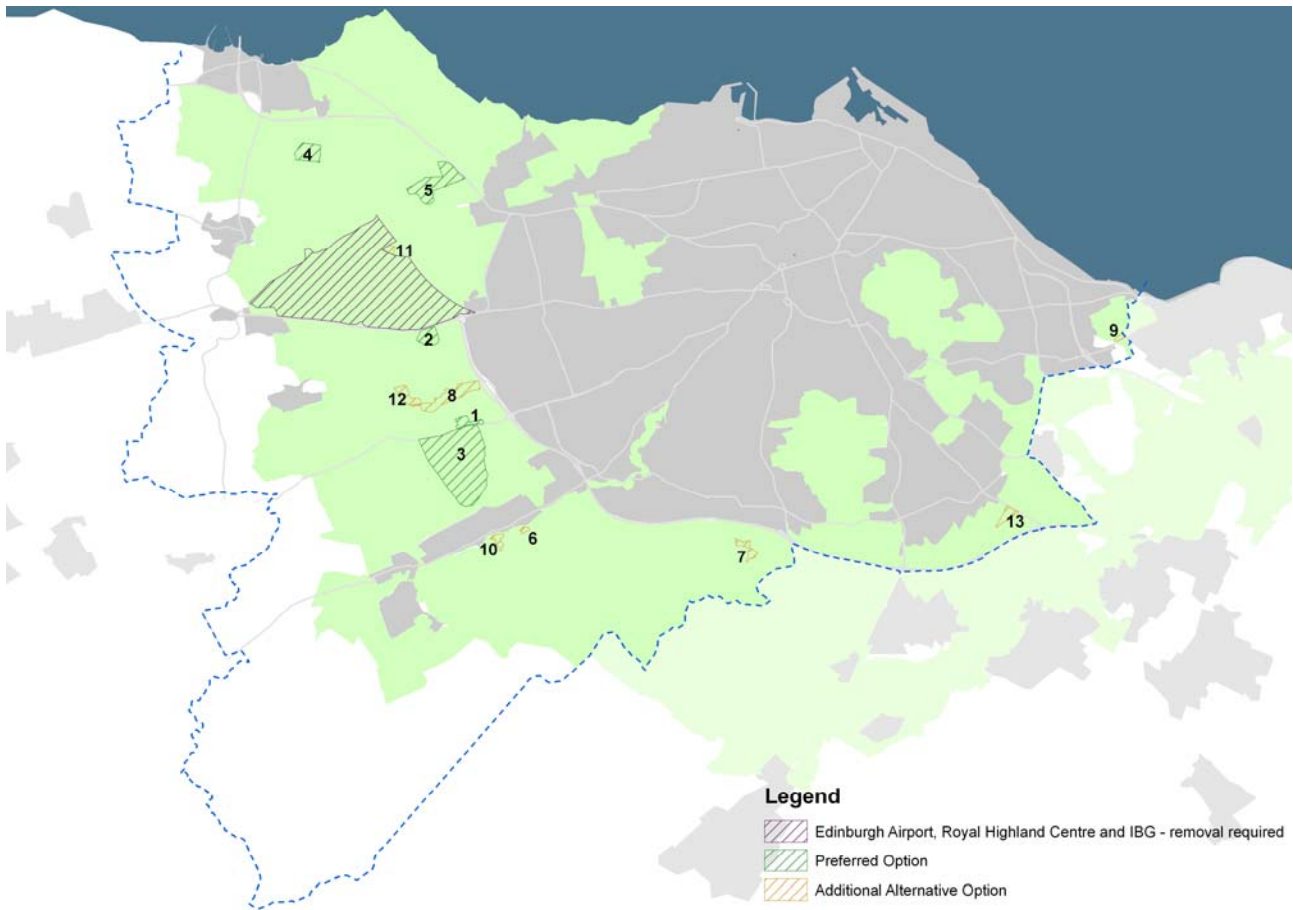
- to identify land for housing and other development to meet the strategic development requirements set out in the SDP. The options being considered through the MIR are explained in chapter 3; and
- to accord with national planning policy.

The LDP could also take land out of the green belt to allow for small scale development opportunities adjacent to smaller settlements – see question 4.

**7.7.** National policy on green belts has changed in recent years and the LDP has to reflect these changes. The West Edinburgh Planning Framework requires land at Edinburgh Airport, the Royal Highland Centre and International Business Gateway to be taken out of the green belt. There is no reasonable alternative to be considered and these green belt boundary changes will be pursued through the Proposed Plan.

## **Excluding settlements and major uses from the green belt**

**7.8.** The green belt also currently covers some existing small settlements, major education/research uses, major business/industrial operations, and Ministry of Defence establishments. Government policy (SPP) states that such uses should be excluded from green belt designation. Leaving these uses in the green belt is not a reasonable option because it would mean the LDP is at odds with national policy. However, there are decisions to be made in terms of defining what is meant by *settlement* and identifying which uses should be excluded. Green belt policy will no longer apply to settlements and major uses taken out of the green belt. The LDP will need to include policy guidance on the nature and scale of development that will be acceptable in these locations.



### Preferred Option

Remove settlements with more than 30 buildings and major uses on sites of 20+ hectares from the Green Belt – see map above and table below.

Map Reference	Settlement	Number of Buildings
1	Hermiston	37
Map Reference	Major Uses	Site Area
2	Royal Bank of Scotland HQ, Gogar	36
3	Heriot-Watt, Riccarton Campus & Research Park	176.8
4	Royal Elizabeth Yard	20
5	Craigiehall	34.5

This is the preferred approach because it meets the requirements of SPP but also ensure there is continuity of Green Belt across the City.

### Reasonable Alternative

Remove settlements with more than 10 buildings and major uses on sites 5+ hectares from the Green Belt – see graphic above and table below.

Same as preferred option plus :		
Map Reference	Settlement	Number of Buildings
6	Blinkbonny	25
7	Swanston	21
8	Gogarbank	20
9	Wanton Walls Farm	19
10	Currie (to south of Water of Leith)	21
Map Reference	Major Uses	Site Area
11	Turnhouse	12.3
12	Science and Advice for Scottish Agriculture (SASA HQ)	8
13	Scrapyard, Gilmerton Road	7.7

This approach would result in a more fragmented green belt and may begin to erode the overall character of the Edinburgh Green Belt.

### Other Option

Continue the approach taken in existing local plans i.e. retaining settlements and majors uses in the green belt. This is not a reasonable option because it is contrary to government policy.

**Question 15: Do you agree with the preferred approach to excluding settlements and major uses from the green belt? Or do you support the alternative?** Please provide a reason for your answer.

### Green Networks

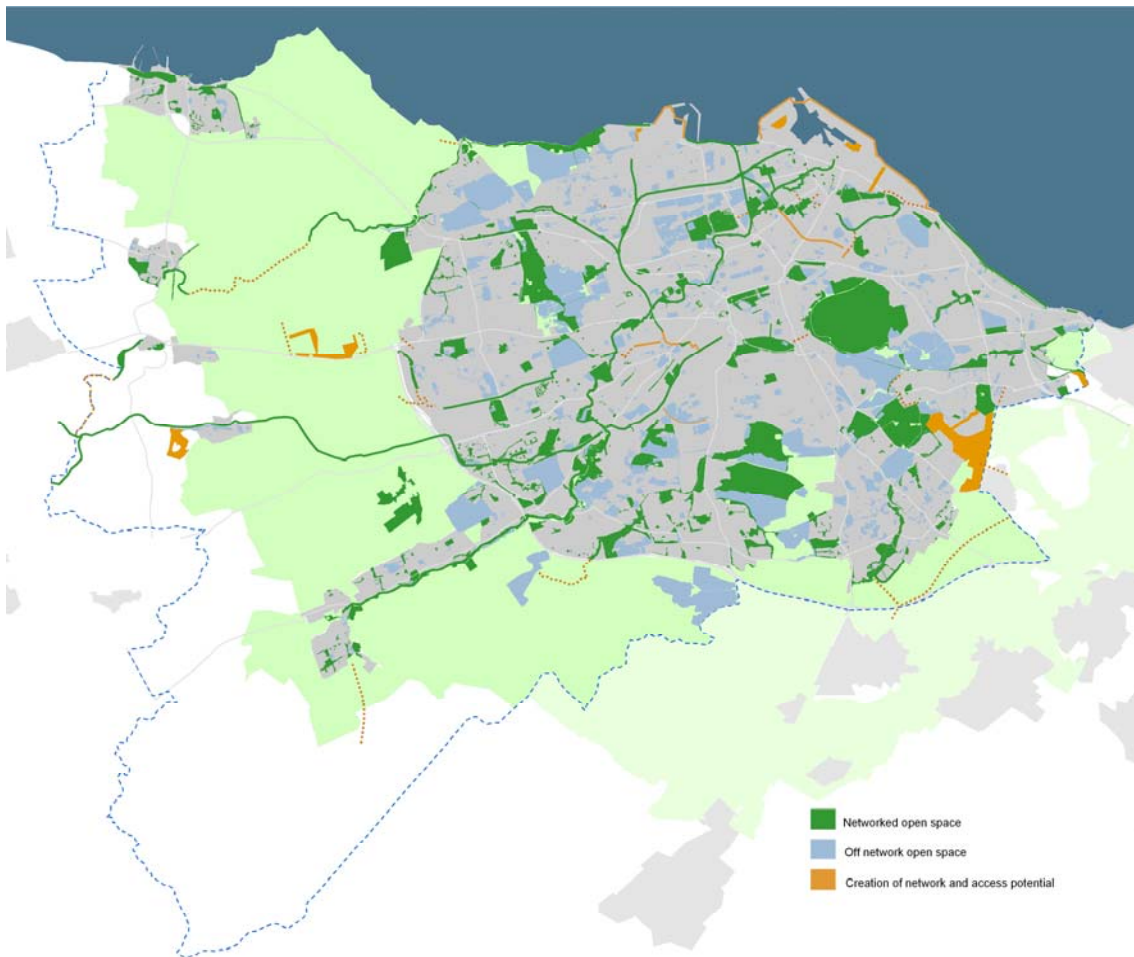
- 7.9.** Good access to attractive open space is an important aspect of quality of place and also the health and well-being of residents and workers. Edinburgh has an extensive network of open spaces, ranging from regional and country parks, multi-purpose urban parks, playing fields, nature reserves, water corridors, footpaths and cycle routes.
- 7.10.** Existing local plan policies seek to protect and enhance the city's green assets and create links and extensions to existing networks where opportunities arise. MS Section 2.1.10 suggests that policies relating to the protection and provision of open space are working well.
- 7.11.** In September 2010, the Council approved the Edinburgh Open Space Strategy (OSS) to ensure a co-ordinated approach to meeting Edinburgh's open space needs and protecting and developing its network of open spaces. It was informed by an audit of all open space in the city and outlying settlements using national definitions. It highlights a number of proposals to connect the existing network and some proposed improvements to existing green corridors. The LDP will include policies to help implement the OSS – see chapter 9.

**7.12.** The Scottish Government's National Planning Framework 2 (NPF2) (2009) identifies the Central Scotland Green Network (CSGN) as a national development to be reflected in all development plans within central Scotland. The CSGN is a *strategic network of woodland and other habitats, active travel routes, greenspace links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation and cultural activity*. The SDP requires LDPs to identify local opportunities to contribute to the development and extension of the CSGN. A CSGN Development Fund was launched in 2010 which provides grants for projects contributing to the delivery of the CSGN. The Council and neighbouring authorities have set up a working group to consider cross boundary issues and opportunities associated with implementing the CSGN.

### **Identifying opportunities to contribute to the Central Scotland Green Network**

**7.13.** A number of proposals to extend the green network in Edinburgh are already identified through the Open Space Strategy and together these will all contribute to the CSGN (see map below). There is also potential to make a significant contribution to the CSGN through the strategic development proposals in West and South East Edinburgh. These growth areas provide opportunities to link existing green corridors identified in the OSS with the wider countryside and green networks in neighbouring Council areas. We are interested in your views on how green network opportunities in West and South East Edinburgh should be identified in the LDP.





### Preferred Option

Based upon the proposed strategic housing sites in West and South East Edinburgh, the LDP will identify broad opportunity areas for extending the green network into the countryside and across Council boundaries. The LDP will require master plans for the housing sites to incorporate greenspace taking account of the OSS and the 10 goals of the CSGN.

This is the preferred approach because it allows green network opportunities to be explored as an integral part of the overall development at the master planning stage.

### Reasonable Alternative

The LDP will identify the exact location of the proposed green network as part of the housing proposals in West and South East Edinburgh. The LDP would identify which parts of the site should be for built development and which should contribute to the CSGN, for example as open space, landscaping, footpaths and cycle routes.

This would provide a clear steer on green network requirements but may be too prescriptive and separate the green network from the built elements of the overall development, contrary to good place-making.

**Question 16: Do you agree with the preferred approach to implementing the Central Scotland Green Network? Or do you support the alternative?** Please provide a reason for your answer.

### **Local Centres and Facilities**

- 7.14.** Attractive local centres, with a good mix of shops and services, located close to where people live, are important to the quality of life of Edinburgh residents. They also help provide a sense of place by providing a mix of uses and a focal point within predominantly residential areas. There are currently 54 local centres across the LDP area and existing proposals for new centres at Leith Docks, Granton and Fountainbridge. Most parts of Edinburgh have a local centre within 15 minutes walk, helping to create a healthy, walking city.
- 7.15.** Outwith centres, shops and other commercial uses located in stand alone units or as part of small groups also provide valuable local services in convenient locations and add to the vibrant character of Edinburgh. In recognition of these benefits, it is proposed to drop existing policy Hou6 in ECLP which restricts the change of use of existing houses to non-residential uses. Any potential concerns about alternative uses being a nuisance to residents will be addressed through other policies, for example ECLP policy HOU8 Inappropriate Uses in Residential Areas.
- 7.16.** The current policy approach to local centres is to support retail, commercial or community uses and prevent the change of use of ground floor premises to residential or other uses which would undermine their purpose. Class 4 business uses, (i.e. where the use does not mainly serve visiting members of the public) are not currently supported in local centres except in the RWELP area. However, a more flexible policy which supports class 4 uses, for example an accountant or architect's office, in local centres could be justified. This change could provide space for small businesses, create employment opportunities in convenient locations, bring vacant shop units back into productive use and contribute to the diverse mix of uses within local centres. It is proposed to retain the existing requirement that the change of use should not result in four or more consecutive non-shop uses. This should ensure local centres continue to provide shopping facilities for the communities they serve.

### **Preferred Option**

- Delete existing policy which restricts the change of use of existing houses to non-residential uses.
- Support the introduction of Class 4 business uses into local centres.

This is the preferred option because it supports the concept of sustainable mixed use communities and allows services and job opportunities to set up in locations where people live.

### **Reasonable Alternative**

Continue to restrict

- the change of use of existing houses to non-residential uses.
- class 4 business uses in local centres

**Question 17: *Do you agree with the preferred approach to changes of uses relating to local centres and facilities? Or do you support the alternative?*** Please provide a reason for your answer.

## 8. CLIMATE CHANGE AND ENVIRONMENTAL RESOURCES

**How best to help reduce greenhouse gas emissions, adapt to a changing climate and address the resource needs of future generations**

[Side box – extract from Sustainable Edinburgh 2020 “Edinburgh in 2020 will be a low carbon, resource efficient city”]

**8.1.** The climate will continue to change over the plan period due to man-made greenhouse gases, including carbon dioxide. The Climate Change (Scotland) Act 2009 places a duty on the Council to act in the best way to reduce emissions, adapt to climate change and prepare development plans to further sustainable development. The LDP will help implement a number of national and city sustainability targets (see table below). Over the course of the plan period, the city will also need to make more efficient use of finite environmental resources.

### National and City Sustainability Targets

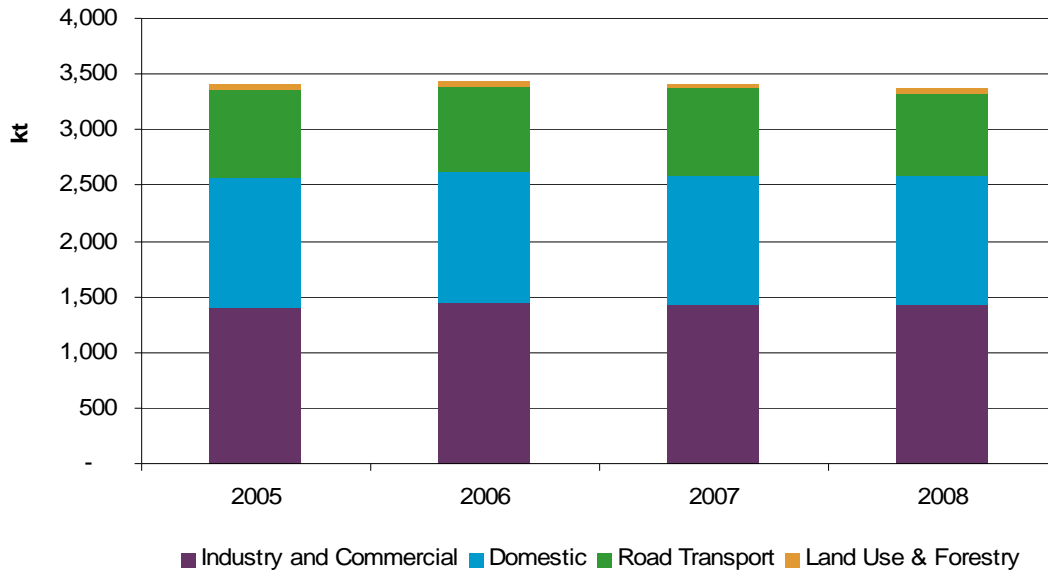
<b>TARGETS</b>	
Carbon dioxide	Reduce carbon emissions by over 40% across the city by 2020 (Sustainable Edinburgh 2020)
Energy use	Reduce energy consumption by at least 12% by 2020 (Sustainable Edinburgh 2020)
Energy generation	More renewable energy, with renewable energy technologies contributing at least 40% of energy consumed in the city by 2020 (Sustainable Edinburgh 2020) Renewable sources to generate the equivalent of 100% of Scotland's gross annual electricity consumption by 2020 (national target)
Heat	Renewable sources to provide the equivalent of 11% of Scotland's heat demand by 2020 (national target)
Waste	70% of all waste to be recycled by 2025 (Zero Waste Plan). No more than 5% of all waste going to landfill by 2025 (Zero Waste Plan).

**8.2.** Meeting these targets will require people to change the way they live and travel and businesses to change the way they operate. The Council is committed to leading from the front on the sustainable development of Scotland's capital city and, in June 2011, published a consultation document *Sustainable Edinburgh 2020 - engaging with our city's future*. Current waste trends (MS section 2.1.12) demonstrate a reduction in household waste and an increased focus on recycling.

**8.3.** The chart below summarises recent carbon dioxide emissions in Edinburgh. It shows that emissions from the built environment have remained relatively steady even in a period when many new, more efficient buildings have been completed. This is because new development, which planning can influence, only forms a small part of the overall built

environment. Making existing buildings more efficient will have a much greater impact on reducing carbon emissions. The challenge for the LDP is to consider what more planning can do to help meet carbon emission targets.

**Edinburgh Carbon dioxide emissions by source (kt CO2)**



- 8.4.** Existing policies which promote development where transport-related energy use and emissions can be minimised will be included in the LDP. Current policy on renewable energy development, including freestanding turbines, micro-generation retrofitted to existing buildings, and energy from waste will also be carried forward. The Council will keep under review its guidance on how this policy is applied in the case of microgeneration equipment on listed buildings and in conservation areas.
- 8.5.** The MS includes information on air, water and soil quality and concludes that no change is required to our existing approach. The existing ECLP flood risk policy also will be retained. The LDP proposals map will identify the land which should remain undeveloped to aid flood management, as shown in the two current local plans. A flood risk management plan for the wider area is being prepared by SEPA in parallel with the preparation of LDP. The LDP will take account of this plan if timing allows. The existing RWELP includes policies on minerals extraction. The number of policies may be reduced in the LDP but the overall approach will remain unchanged.
- 8.6.** Some changes are needed to update and improve how the plan deals with sustainable building design and waste management facilities.

### **Sustainable building design**

- 8.7.** The ECLP sets sustainability requirements for new build developments. These include requirements for energy efficiency and low and zero carbon technology, with numerical thresholds and targets set in a table in the supporting text. Shortly after the ECLP was

adopted, national building standards were revised to set higher levels of carbon dioxide reduction and these now form the basis of the Council's approach. [\(insert side box Image of S1 form close up\)](#)

- 8.8.** Section 3F of the Town and Country Planning (Scotland) Act 1997 states that LDPs must include policies requiring developments to be designed so as to ensure that all new buildings avoid a specified and rising proportion of projected greenhouse gas emissions. Ministers are required to report annually on the implementation of section 3F and in 2014 must indicate whether there is still a need for such a requirement. At that time, Ministers may conclude that the Building Standards are a more effective tool than planning policy in terms of ensuring new development mitigates the effects of greenhouses gas emissions.
- 8.9.** It is proposed to maintain the ECLP policy on sustainable design and construction (Des 6) and supporting text unchanged apart from the exceptions below:
- Introduction of requirement for green roofs in new development where ground SUDS (sustainable urban drainage systems) do not need to be provided because runoff will be drained by combined schemes. This is important for climate change adaptation i.e. more incidences of extreme weather, including heavy rain; and
  - Requirement for major developments (above a specified scale) to include land or floorspace reserved for Combined Heat and Power (CHP) plant. This is in anticipation of increased use of CHP to meet the national and local energy and heat targets. The International Business Gateway in West Edinburgh may be suitable for CHP.
- 8.10.** We are considering two different options to identifying carbon reductions targets as part of the Council's approach to climate change mitigation.

### Preferred Option

Revise policy to:

- state a specified and rising planning requirement for carbon reduction through the use of on-site low zero carbon technology.
- introduce a requirement for green roofs and CHP (as explained in section 8.9)

This is the preferred approach because it accords with the current requirements of Section 3F of the Planning Act. However, we are concerned that the benefits of having the targets set out in the LDP may be outweighed by possible future confusion between the policy and building standards.

### Reasonable Alternative

Amend supporting text to indicate that development must meet the carbon reduction targets set out in the current Building Standards but not include numerical figures in LDP policy (these standards set out how emissions reductions should rise in the future).

This cannot be the preferred approach at this time because of the wording of Section 3F. However, if this requirement of the Act is deleted or amended, this would be our preferred approach.

**Question 18: Do you agree with the preferred approach to setting out carbon reduction requirements? Or do you support the alternative?**

**Do you support the suggested policy changes in relation to green roofs and Combined Heat and Power plant?**

Please give reasons for your answers

## **Waste management**

- 8.11.** National targets (set out in the Scottish Government's Zero Waste Plan) mean less waste will go directly to landfill in future, and instead will be processed in various ways. These processes will result in the need for new waste treatment facilities over the plan period. Many of these will be developed or operated by private firms. Currently the city is a net exporter of waste for recycling. Most of the domestic recycling collected by the Council goes to waste management facilities located in industrial estates in neighbouring authorities.
- 8.12.** The SDP looks at the provision of waste management facilities across the SESplan area and requires four strategic waste management sites to be safeguarded. None are in the Edinburgh area.
- 8.13.** In April 2011, the Council held a seminar to discuss future waste management facilities with representatives of the waste management industry and community groups. Community views ranged from opposition to the principle of new waste management facilities anywhere within the city to acceptance of the principle of modern, environmentally controlled facilities within industrial areas. Industry representatives highlighted how difficult it is to predict what types of facilities will be needed to meet the national targets.
- 8.14.** The SDP requires LDPs to encourage proposals for the recycling and recovery of waste where the proposal accords with the Zero Waste Plan, taking into account planning issues such as amenity and traffic impact. There is no longer a requirement to consider the need for the proposal and therefore the LDP should set a simpler waste management policy than the current approach.

## **Preferred Option**

- Revise the policy on new waste management facilities to continue to support these in business and industry areas but no longer require need to be demonstrated or reference be made to best practicable environmental option.
- Retain reference to waste management / energy from waste / CHP safeguard in Leith Eastern Industrial Area (ECLP Proposal BUS 3)

This is the preferred approach because it allows proposals for waste management facilities to be provided in suitable locations and highlights a known opportunity at Leith.

#### **Reasonable Alternative 1**

As above, but identify more specific waste management proposals in LDP or action programme following further engagement with waste management industry.

#### **Reasonable Alternative 2**

As Preferred Option, but drop safeguard in Eastern Leith due to current lack of interest from the waste management industry.

**Question 19: *Do you agree with the preferred approach to waste management? Or do you support one of the alternatives?*** Please give reasons for your answers



## **9. OTHER POSSIBLE CHANGES**

- 9.1.** This section covers other issues highlighted in the MS that require changes to existing local plan policies or proposals. These are not *main issues* because either the changes are relatively minor or the options of how to address the issue are relatively limited. However, you are welcome to make comments on any of the matters included in chapter 9 and these will be taken into account in preparing the LDP.
- 9.2.** The following issues are included in this section:
- affordable housing
  - infrastructure safeguards
  - review of existing business and industry designations
  - supermarkets
  - design policies
  - landscape and natural heritage designations
  - implementing the Open Space Strategy
  - environment proposals
  - landfill

### **Affordable Housing**

- 9.3.** Ten years ago, the Council introduced a planning policy requiring housing developments over 12 units to include a proportion of affordable housing. The required proportion is 25% and it is not intended to change this figure. It is justified by an assessment of housing need and there is no evidence that the affordable housing policy is causing the housing delivery problems described in chapter 3. It is proposed to amend the policy to remove the requirement for affordable housing provision to be on-site. Off-site provision can bring benefits in terms of the quick delivery or amount of affordable housing and, in exceptional circumstances, has been supported. This flexibility is subject to restrictions which prevent over-concentration of social-rented housing in off-site locations.

### **Infrastructure Safeguards**

- 9.4.** The LDP will safeguard land to accommodate the necessary infrastructure required to deliver the strategy of the SDP. These safeguards are identified in the Proposed SDP and accompanying action programme and, in some cases, will require updates and amendments to existing local plan infrastructure proposals. A number of existing local plan proposals have now been implemented and will not be included in the LDP, for example the Wisp and A8000 road improvements. The table below outlines the other suggested changes relating to transport infrastructure proposals. In preparing the LDP, it may become apparent that other infrastructure is also essential to support new development. These will also be identified in the LDP or accompanying Action Programme.

Existing Transport Proposals	Proposed Change	Reason
<b>Rural West Edinburgh Local Plan</b>		
T6 Newbridge Rail Station	Delete safeguard	Not supported by Transport Scotland
T7 Currie Bypass	Delete proposal	Not being progressed
T8 Upgrading of A71 to west of Riccarton Mains Road	Delete proposal	Not being progressed
<b>Edinburgh City Local Plan</b>		
Tra 8 Park and Ride sites	Delete Ferniehill site Include the following new safeguards :- - Extension at Hermiston - Hermiston Gait - Lasswade Road - Gilmerton Road	Ferniehill proposal not being progressed because route already served by Todhills in Midlothian. Other sites identified through feasibility studies.
<b>Proposed New Transport Proposals</b>		<b>Reason</b>
Forth Crossing and approach roads		A National Development. Safeguard required by SDP
Orbital Bus Route		Safeguard required by SDP

### Review of existing business and industry designations

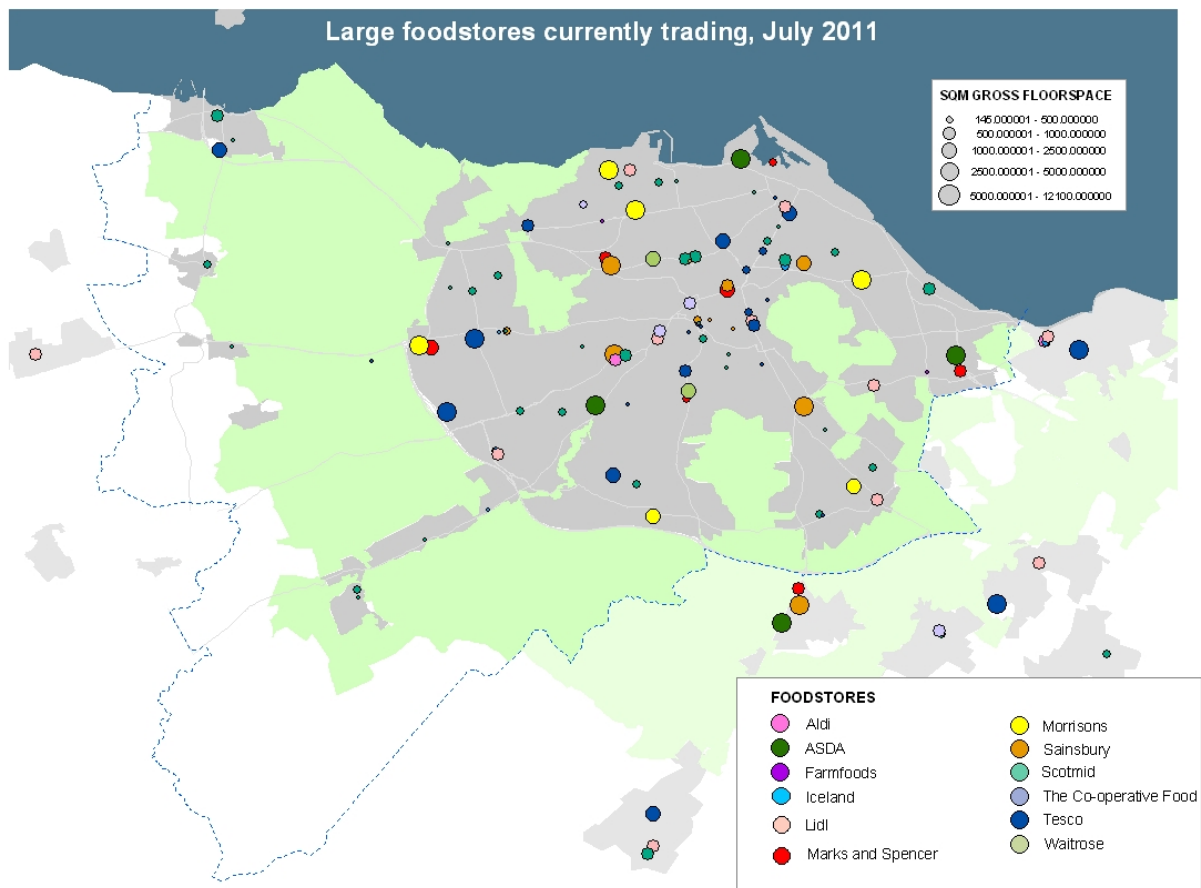
- 9.5.** In preparing the ECLP, a review of existing business and industry areas was undertaken and the number of areas protected was reduced. The ECLP includes a business proposal at Leith Eastern Industrial Area. There are no plans to make changes to these designations.
- 9.6.** There is a need to amend some of the existing business proposals and allocations in the RWELP area to reflect changes that have taken place since this plan was adopted. Most existing and proposed business and industry land in Rural West Edinburgh is at Newbridge and Ratho Station. No significant changes are proposed and these areas will continue to make an important contribution to the city economy. Suggested changes to existing business proposals and allocations are set out in the table below.

Business Proposals	Proposed Change	Reason
ECON1 South Scotstoun Queensferry	Delete proposal	To be redeveloped for housing
ECON2 Ferrymuir	Delete proposal	Site has planning permission for housing and other uses.
ECON4 Cliftonhall Road, West Edinburgh	Delete proposal but retain in business and industry area	Site too small to be included as LDP proposal
ECON6 Cliftonhall Road, South Newbridge	Delete proposal but retain in business and industry area	Proposal implemented.

ECON9 Gogarburn	Revise boundary of proposal	To remove part of site already developed.
ECON 10 Port Edgar	Delete proposal	Existing proposal is not being progressed. Removal of proposal will allow alternative options to be explored.
<b>Existing Business Areas</b>	<b>Proposed Change</b>	<b>Reason</b>
Ferrymuir, Queensferry	Delete designation	Site has been developed for non-business uses.
South Scotstoun, Queensferry	Delete designation	Site has been vacated by Agilent and is to be redeveloped for housing.
Currie	Delete designation	Site has planning permission for housing and other uses.

### Supermarket provision

- 9.7.** We don't think there are any gaps in supermarket provision across the LDP area (see map below). One exception is Wester Hailes where there is already a local plan proposal for a new supermarket as an extension to the existing centre.
- 9.8.** Our intention is to continue the existing policy approach to supermarket provision. This indicates that out of centre sites are the least preferred options for new retail development. However, there have been recent cases where planning permission has been granted for new supermarkets on out of centre sites which may suggest a revised approach is needed. Do you think there are any areas where existing supermarket provision is inadequate? If new supermarkets are needed, where should these be located – in or on the edge of existing centres, on stand-alone sites?



## Design Policies

**9.9.** MS Section 2.3.5 indicates that existing design policies are not working as well as intended in terms of the quality of new development. However, the policies fit with national policy and good practice, so the wording does not necessarily need to be changed. It is intended to clarify the interpretation of the policies through restructuring and by consolidating the Council's design guidance.

## Landscape and Natural Heritage Designations

**9.10.** The existing local plans currently have two local landscape designations – Areas of Great Landscape Value (AGLV) in the ECLP and Areas of Outstanding Landscape Quality (AOLQ) in the RWELP. The Council has undertaken a comprehensive review of Edinburgh's local landscape designations in line with national policy. This review included a consultation stage in summer 2009 and comments submitted were taken into account prior to approval of the finalised review of local landscape designations.

**9.11.** The review identifies 22 candidate Special Landscape Areas (cSLAs) which will be formally designated through the LDP. Many cSLAs coincide with existing AOLQs and AGLVs. However there will be some changes from the existing local plans - cSLAs on new sites not previously covered by a local landscape designation and existing sites not included in a cSLA (MS section 2.3.1). As we have already consulted on the cSLAs, we are not actively

seeking views at the MIR stage. One exception is the cSLA at the Drum Estate in South East Edinburgh, the boundary of which may need to be amended to allow for housing development (Your views on this housing proposal are sought in chapter 3).

- 9.12.** It is also intended to amend the Local Nature Conservation Sites shown on the Proposals Map to reflect recent updates.

### Implementing the Open Space Strategy

- 9.13.** Edinburgh’s green network, including gaps in provision and new opportunities, is identified in the Open Space Strategy (OSS). The Strategy also sets three standards of open space provision and estimates needs for certain other types of open space. One means of implementing proposed connections and improvements identified in the OSS is in conjunction with development.
- 9.14.** It is proposed that the LDP will explain how development proposals should implement the OSS. This explanation will be similar to that in the implementation chapter of the OSS, which explains how to interpret the relevant ECLP policies on provision and loss of open space. Those policies (Hou 3 and Os 1-3) are unlikely to require significant changes.
- 9.15.** It is intended that the LDP Proposals Map will identify existing open space as identified in the audit. Additions or deletions to open space which have taken place on the ground since 2009 may be incorporated as technical modifications at the appropriate stage in the preparation of the LDP. A second audit of open space will be carried out in 2014.

### Environment Proposals

- 9.16.** The RWELP includes a number of environmental proposals. It is necessary to review these as part of the LDP process to assess their continued relevance and likelihood of being implemented. The table below indicates where changes are proposed and the reasons.

Environment Proposals	Proposed Change	Reason
ENV1 Mallyen Park, Balerno	Delete proposal but retain in green belt.	No evidence to suggest proposal can be implemented in plan period.
ENV2 Muir Wood Field, Currie	Delete proposal but retain in green belt.	No evidence to suggest proposal can be implemented in plan period.
ENV3 Currie South Station	Delete proposal but retain in green belt.	No evidence to suggest proposal can be implemented in plan period.
ENV4 Catherine Terrace, Queensferry	Delete proposal but retain in nature conservation site.	No evidence to suggest proposal can be implemented in plan period.
ENV5 Ferry Glen, Queensferry	Delete proposal.	Proposal has been

		implemented.
ENV6 Springfield, Queensferry	Delete proposal.	Open space requirements will be considered as part of revised housing proposal.

**Landfill**

**9.17.** There are currently no landfill sites operating in the Edinburgh area. The two existing local plans take slightly different approaches to landfill. The ECLP policy does not support any landfill/ landraise proposals unless there are environmental benefits. The RWELP includes a criteria based policy against which any future proposals would be assessed.

**9.18.** The SDP provides the context for the approach to be taken in the new LDP. It states that no additional landfill capacity is required within the whole SESplan area over the life of the SDP i.e. up to 2032 (unless required by Scottish Environmental Protection Agency Landfill Capacity Reports). We are not aware of any justification for new landfill sites in the Edinburgh area in the period of the LDP (Up to 2024). The LDP will therefore state that proposals for new landfill or landraise sites will not be permitted unless there will be significant environmental benefits. This approach takes account of the Zero Waste Plan and the SDP.

**Question 20 Have you any comments on the other possible changes outlined in Chapter 9?**

All responses on these matters will be taken into account in preparing the LDP.

## 10. SPATIAL IMPLICATIONS

**10.1.** The SDP vision for Edinburgh is for development to focus on four strategic development areas at West Edinburgh, South East Edinburgh, the City Centre and Waterfront. More generally, it promotes a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business. The LDP will help deliver this vision by retaining existing policies which are working well, continuing to promote existing proposal sites and addressing the main issues outlined in chapters 3-8.

Insert maps to illustrate what the main issues could mean for different parts of the LDP area

- The LDP area as a whole
- the four strategic development areas
- the remainder of the city urban area
- outlying settlements i.e. Queensferry, Kirkliston, Newbridge, Ratho Station, Ratho, Currie and Balerno
- green belt and countryside

## 11. COMMENTING ON THE MAIN ISSUES REPORT

**11.1** This is our main opportunity to consult local residents and other stakeholders on matters to be included in the LDP. Consultation on the Main Issues Report and the accompanying Environmental Report will take place over three months until end of January 2012. A Participation and Engagement Statement will be prepared set out in detail how to get information on the MIR and ER and the dates, times and venues of consultation events.

**11.2** The following summarises our intentions;

- Written comments can be submitted :
  - online at [www.edinburgh.gov.uk/localdevelopmentplan](http://www.edinburgh.gov.uk/localdevelopmentplan)
  - by email to [localdevelopmentplan@edinburgh.gov.uk](mailto:localdevelopmentplan@edinburgh.gov.uk)
  - or by post to **The Local Development Plan Team, Waverley Court (G1), 4 East Market Street, Edinburgh EH8 8BG.**
- Staffed Exhibitions at shopping centres and other locations across the City
- Topic Workshops on, for example :
  - shopping
  - infrastructure
- Area Workshops on, for example:
  - West Edinburgh housing options
  - South East Edinburgh housing options
- Library Information Packs
- Web information including:
  - online MIR animations, and
  - interactive map based presentation of background material

Further copies of the MIR can be obtained by emailing [janis.o'sullivan@edinburgh.gov.uk](mailto:janis.o'sullivan@edinburgh.gov.uk) or phoning 0131 529 3500.

**11.3** The MIR invites responses to the 20 questions listed below. You can submit answers to all 20 questions or just focus on those of most interest to you. Comments can also be submitted on any other aspect of the MIR, or regarding issues that are important to you which have not been included.



## 20 QUESTIONS TO HELP GUIDE EDINBURGH'S FUTURE

**Question 1: *In considering the future of Edinburgh, what matters most to you? Do you agree with these 5 aims or are there other priorities?*** Please provide a reason for your answer.

**Question 2: *Do you agree with the sites identified in the preferred option to meet the requirement for 2000 houses in West Edinburgh? Or do you support any of the sites listed as reasonable alternatives?*** Please provide a reason for your answer.

**Question 3: *Do you agree with the sites identified in the preferred option to meet the requirement for 1000 houses in South East Edinburgh? Or do you support any of the sites listed as reasonable alternatives?*** Please provide a reason for your answer.

**Question 4: *Do you agree with the preferred approach to new housing on greenfield sites in areas other than West and South East Edinburgh? Or do you wish to suggest a potential site as an alternative option?*** Please provide a reason for your answer.

**Question 5: *Do you agree with the preferred approach to how the LDP should deal with housing in the built up areas? Or do you support the alternative?*** Please provide a reason for your answer.

**Question 6: *Do you agree with the preferred option for the future role of Leith Docks? Or do you support the alternative?*** Please provide a reason for your answer.

**Question 7: *Do you agree with the preferred option for the 4 potential housing regeneration sites on existing open space? Or do you support the alternative?*** Please provide a reason for your answer.

**Question 8: *Do you agree with the preferred approach to Houses in Multiple Occupation? Or do you support the alternative?*** Please provide a reason for your answer.

**Question 9: *Do you agree with the preferred approach to seeking developer contributions towards infrastructure provision? Or do you support the alternative?*** Please provide a reason for your answer.

**Question 10: *Do you agree with the preferred approach to planning for and providing office space in Edinburgh? Or do you support the alternative?*** Please provide a reason for your answer.

**Question 11: Do you agree with the preferred approach to meeting the needs of small businesses? Or do you support one of the alternatives?** Please provide a reason for your answer.

**Question 12: Do you agree with the preferred approach to planning for new retail development? Or do you support the alternative?** Please provide a reason for your answer.

**Question 13: Do you agree with the preferred option to allow some non-shop uses along Princes Street? If so, on which frontages do you think non-shop uses should be allowed (see A – G on page 34)? Or do you support the alternative?** Please provide a reason for your answer.

**Question 14: Do you agree with the preferred approach to non-retail uses in town centres? Or do you support the alternative?** Please provide a reason for your answer.

**Question 15: Do you agree with the preferred approach to excluding settlements and major uses from the green belt? Or do you support the alternative?** Please provide a reason for your answer.

**Question 16: Do you agree with the preferred approach to implementing the Central Scotland Green Network? Or do you support the alternative?** Please provide a reason for your answer.

**Question 17: Do you agree with the preferred approach to changes of uses relating to local centres and facilities? Or do you support the alternative?** Please provide a reason for your answer.

**Question 18: Do you agree with the preferred approach to setting out carbon reduction requirements? Or do you support the alternative?**

**Do you support the suggested policy changes in relation to green roofs and Combined Heat and Power plant?** Please give reasons for your answers

**Question 19: Do you agree with the preferred approach to waste management? Or do you support one of the alternatives?** Please give a reason for your answer.

**Question 20: Have you any comments on the other possible changes outlined in Chapter 9?** All responses on these matters will be taken into account in preparing the LDP.

This Main Issues Report is the key document in terms of frontloading effective engagement on the Edinburgh Local Development Plan. It is the principal opportunity within the plan preparation process for productively consulting stakeholders and the wider public on the content of the plan.

This is the interim participation programme and does not include specific dates and venues. These will be set and publicised between the approval of the MIR and its publication.

### **Statutory Minimum Requirements**

To meet statutory requirements the Council must:

- Provide paper copies of the document available at all public libraries and the Council planning office.
- Post the document on the Council website.
- Prepare a statement that the document has been prepared and providing:
  - details of where and when it may be inspected;
  - a brief description of the content and purpose of the document;
  - details of how further information may be obtained regarding the document, including that it is to be published on the internet;
  - a statement that anyone wishing to make representations on the content is able to do so; and
  - information as to how and to whom any representation should be made and the date by which they should be made.
- Place this statement in a local newspaper and on the internet.
- Send this statement out to:
  - key agencies;
  - adjoining planning authorities;
  - SESplan authorities; and
  - all Edinburgh Community Councils.

These publication requirements are a statutory minimum, and Scottish Ministers' expectation is that authorities will have already considered, through their participation statement, the best ways of engaging stakeholders and the wider public. They are supplemented by additional measures set out in the 2011 Development Plan Scheme.

### **Development Plan Scheme Commitments**

The Development Plan Scheme states we will be:

- Sharing information at staffed exhibitions at public events, markets and shopping centres.
- Using the media to raise awareness including features in the Council's "Outlook" publication.
- Conducting an Online and freepost questionnaire with the 20 MIR questions.

### **Further Measures**

- Advertise on CEC homepage and consultations page
- Using social networking site Twitter – provide an update on a weekly basis.
- Sharing information and engaging younger members of the public e.g. through Edinburgh Youth Issues Forum
- Urban Room exhibition.
- Slide show video presentations on website and in the Urban Room.
- Pop up display boards to “attract and explain” at staffed exhibitions, workshops.
- A LDP postcard to handout with a web address on it for more information.
- Presentations at the Civic Forum, Edinburgh Business Forum and Edinburgh Development Forum.
- Workshops with residents in strategic development areas to inform on process.: West, South East, City Centre and Waterfront.
- Contact Community Councils and Neighbourhood Partnerships with dates for consultation and asking how they would like to engage – email or number of paper copies etc.
- PAS Planning for People Training for community councils and young people.

The LDP webpage will be updated with details of events as they are confirmed:

[www.edinburgh.gov.uk/localdevelopmentplan](http://www.edinburgh.gov.uk/localdevelopmentplan)