

Planning Committee

2.00pm, Wednesday, 23 February 2022

Scoping report considering opportunities to review current planning policies and guidance to assist in meeting the climate change emergency and net-zero carbon targets

Executive/routine Wards Council Commitments	Routine All
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1. Recommendations

- 1.1 It is recommended that the Planning Committee:
 - 1.1.1 Notes the content of this report; and
 - 1.1.2 Agrees that this report discharges the remit set by Planning Committee on 11 August 2021.

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Scoping report considering opportunities to review current planning policies and guidance to assist in meeting the climate change emergency and net-zero carbon targets

2. Executive Summary

- 2.1 This report responds to the Motion, and Amendment, approved by Planning Committee on [11 August 2021](#), instructing a scoping report be brought to February 2022 Planning Committee examining built environment and building fabric related issues to identify whether changes in the current policies and guidance is appropriate in order to address the climate change emergency and zero carbon commitment. The Motion and Amendment also requested an update to committee members on the advice and financial assistance that is available to citizens to undertake energy efficiency improvements, including to the windows in their homes.
- 2.2 This report advises the Planning Committee of the work undertaken to date by the Planning Service around sustainability and climate change, and explores future opportunities to review, amend and add to planning policies and guidance to work towards the City of Edinburgh Council's aspiration of being net-zero carbon by 2030.
- 2.3 The Council has long established planning policies and guidance that seek a cleaner, greener, more sustainable environment for our city.
- 2.4 It is recognised that further opportunities exist to meet the agenda of net-zero carbon, but this requires to be balanced against preserving and enhancing our built heritage and working alongside other regulatory regimes.
- 2.5 Implementing our policies and guidance also relies heavily on our stakeholders, developers and citizens recognising the role they have to play in addressing climate change.
- 2.6 The report also sets out financial assistance available for energy efficiency improvements.

3. Background

- 3.1 The Motion, and Amendment, approved by Planning Committee on 11 August 2021, requested that a scoping report be brought to Committee examining built environment and building fabric related issues, to identify whether changes in the current policies and guidance are appropriate in order to address the climate change emergency and zero carbon commitment.
- 3.2 Scotland's climate is already changing. Over the last century temperatures have increased, sea levels have risen, and rainfall patterns have changed, with increased seasonality and more heavy downpours. The experience of recent years has shown that climate change and extreme weather events have already impacted many aspects of the natural environment and society, including buildings and property, health, agriculture, forestry, transport, water resources and energy demand. These changes are projected to continue and intensify over the coming decades.
- 3.3 The Council's planning response to the climate change emergency and zero carbon agenda sits within a hierarchy of planning policy, guidance and best practice advice.
- 3.4 The Council produces, and helps shape, a wide range of plans, policies and frameworks at the national, regional, citywide and local level. Planning authorities have a statutory function and must operate within this legislative hierarchy. Decisions must be guided by policies in the development plan.

4. Main report

- 4.1 The Council as planning authority is acutely aware of the issues around climate change and has, for decades, been setting policy and preparing guidance to assist in creating more sustainable, accessible and greener places.
- 4.2 The Edinburgh Local Development Plan is more than five years old and is in the process of being replaced by [City Plan 2030](#).
- 4.3 The [National Planning Framework](#) (NPF) provides a statutory framework for Scotland's long-term spatial development and draft NPF4 is likely to be approved late summer 2022. NPF4 will become part of the development plan. It will inform the examination of City Plan 2030 later this year. The policies in City Plan 2030 support the Council's target for Edinburgh to become a more sustainable place and a net zero city by 2030.
- 4.4 To support City Plan 2030, Planning will be updating and adding to its guidance, providing detail on how to implement the policies to create more sustainable places. Some of this work will represent updates to existing guidance, and some will be new guidance, for example, in relation to green roofs and place briefs for brownfield sites. The development principles within place briefs are likely to include, among other things, objectives for, green/blue infrastructure, active travel, Sustainable Drainage Systems (SuDS), trees and biodiversity.

- 4.5 Work on updating and reviewing planning guidance is already underway. The attached appendices provide more detailed information relating to a number workstreams.

Built Heritage and Built Environment

- 4.6 Historic Environment Scotland (HES) and Edinburgh World Heritage (EWH) are actively engaged in research projects and preparing guidance aimed at building resilience in our historic assets through adaptation and maintenance.
- 4.7 Windows are important to the energy efficiency of buildings. HES is proposing to undertake a research project at the start of 2022 to consider, and make comparisons between, the life cycle assessment and whole life cost of a traditional timber casement window and a modern replacement uPVC window. The findings will assist in the Council's review of guidance on replacement windows later this year.
- 4.8 City Plan 2030 aims for all new buildings to be net-zero carbon through their built fabric and design, and their operational greenhouse gas emissions. Where new development includes demolition, consideration to their retention and repurposing may better achieve the net-zero carbon aims. This form of assessment requires further investigation through the preparation of City Plan 2030.
- 4.9 A review of the [Edinburgh Design Guidance](#) with regards to sustainability and climate change adaptation is currently underway and will consider these issues in conjunction with City Plan 2030. It is anticipated that this will be reported to the Planning Committee towards the end of 2022.
- 4.10 It should be noted that in some circumstances the Council cannot control new developments. The Town and Country Planning (General Permitted Development) (Scotland) Order 1992, as amended, allows significant levels of development within the grounds of a dwelling house and, to a lesser extent, within the grounds of a flatted development.
- 4.11 Where control can be exercised over development, greater emphasis will be placed on sustainable development and climate change adaptation. The Guidance for Householders will be reviewed later this year to address this. Consideration will also be given to surface water management issues in that review.

Transport

- 4.12 The [City Mobility Plan](#), [Low Emission Zone](#) and [City Centre Transformation Strategy](#) all consider the impact of transport choices on the climate and seek a move towards more sustainable modes of transport such as walking and cycling. Work is already well underway to implement these projects. Although the function and design of roads falls under the Roads (Scotland) Act 1984, Planning can assist in influencing modes of transport, through the creation of opportunities for active travel, ensuring the provision of cycle parking, assessing numbers of car parking spaces and consenting developments that are well connected and accessible.

Water and Blue/Green Networks

- 4.13 The Edinburgh and Lothians Strategic Drainage Partnerships (ELSDP) in October 2019 was aimed at developing a co-ordinated and transformative approach across Edinburgh and the Lothians to drainage, water management and flooding issues.
- 4.14 The City of Edinburgh Council's [Vision for Water Management](#) was approved in November 2020. As part of this work the [Edinburgh's Sustainable Rainwater Guidance](#) is being developed. This guidance will form part of the Edinburgh Design Guidance as it is reviewed later this year.

Biodiversity

- 4.15 The next iteration of the [Edinburgh Biodiversity Action Plan](#) is currently being drafted and will include green and blue infrastructure, adaption solutions, SuDS and biodiversity rich landscape schemes.
- 4.16 City Plan 2030 has specific policies which support and protect biodiversity in the city.
- 4.17 The Planning (Scotland) Act 2019, requires authorities to prepare a Forestry and Woodland Strategy. Work on this strategy is underway, for publication in late 2022.

Constraints

- 4.18 The Planning Authority operates within a legislative framework, which may influence the ability to exercise control over development, for example, when permitted development rights apply. On occasions other legislation may also constrain actions, such as the Building Regulations or the Transport Act and there is therefore a need to be mindful of these.

Financial assistance

- 4.19 In relation to financial assistance, Warmer Homes Scotland is a Scottish Government funded scheme to assist with making improvements to homes to reduce fuel bills. The following websites offer advice and information:
 - 4.19.1 [Energy Saving Trust Scotland](#) helps you save energy and reduce your bills.
 - 4.19.2 [Greener Scotland](#) gives advice on how to save energy, reduce waste, travel smarter and eat greener.
 - 4.19.3 [Age Scotland](#) has guidance on energy and how to reduce your bills.
 - 4.19.4 [Fuel Bank Foundation](#) has advice for managing your energy account.

Conclusion

- 4.20 This report, and the attached appendices, demonstrate the breadth of work that is already underway within the planning service, and in collaboration with other council services, external agencies and stakeholders, to meet the climate change challenge and work towards the Council's aim to be net-zero carbon by 2030.
- 4.21 The climate change agenda is vast and requires significant research and investment. Technologies are constantly improving and working alongside other council services and partner organisation, the service will aim to continually review

and update policies and guidance to reflect emerging best practice and technological advances.

- 4.22 Residents, business and other stakeholders have a significant role to play. Whilst the council establishes policy and guidance, and leads with demonstration projects, the biggest impact will come from those who own, or have an interest in the built and natural environment, implementing these policies and best practice.

5. Next Steps

- 5.1 Appendix 1 highlights a list of projects that impact on climate change and the aspiration for the City of Edinburgh to be net-zero carbon by 2030. Much of this programme of work is already underway and the remainder will be rolled out throughout 2022 and beyond.

6. Financial impact

- 6.1 In relation to preparing updated and new guidance, this will be done within the existing operating budget of the planning service.

7. Stakeholder/Community Impact

- 7.1 Stakeholders and the community have a significant role to play in implementing and delivering the Council's policy and guidance.
- 7.2 The proposed policy and guidance helps to create sustainable development and adaptation to climate change. Consultation will be undertaken on any new policies or guidance.

8. Background reading/external references

- 8.1 See links embedded within Appendix 2.

9. Appendices

- 9.1 Appendix 1 – Programme of Work relating to policies/guidance/advice on Climate Adaptation and Net-Zero Carbon.
- 9.2 Appendix 2 – Detailed report on Planning policy and guidance in relation to Climate Change Emergency and Zero Carbon Development.

Appendix 1 – Planning work programme relating to policies and guidance on Climate Adaptation and Net-Zero Carbon.

February 2022

	Action	Lead	Resource	Action already completed	Timeframe
City Wide					
Action Plan	Edinburgh Adapts – Action Plan involving 50 different organisations across the city setting out an action plan to build resilience.	Edinburgh Sustainable Partnership	50 different orgs - Planning involved - CP	Work on going	On-going – vision to 2050
New development	City Plan 2030 - Policies and Spatial Strategy to reflect both carbon reduction and adaptation for the city. Series of guidance to support City Plan will be required.	Planning	Planning and consultants as required	Approved by Planning Committee 23 September 2021. Consultation closed and representations being analysed. Submission to Scottish Ministers in 2022.	To be carried out in line with the timescale for City Plan 2030.
Built Environment					
New Development	20 minute neighbourhood – work already commenced on the concept and pilot projects identified.	Corporate Services	Specific team being set up with input from planning - AL	Draft Strategy reported to Policy and Sustainability Committee 10 June 21.	To be carried out in line with the timescale for City Plan 2030.
Passive house/low carbon buildings	City Plan 2030 - Ensure new buildings are built to higher standard by changing policy	Planning	TBC	Work on going	To be carried out in line with the timescale for City Plan 2030.
Place briefs	City Plan 2030 - Place briefs for selected brownfield and green field sites to reflect change policy and include development principles for each site covering issues such as	Planning	In house	Work on going	To be carried out in line with the timescale for City Plan 2030.

	Action	Lead	Resource	Action already completed	Timeframe
	green/blue infrastructure, active travel, SUDS, trees and biodiversity.				
Carbon cost of reuse of existing buildings	City Plan 2030 – Research regarding the carbon impacts of developing new building vs impacts of retention.	Planning	In house	Work on going.	To be carried out in line with the timescale for City Plan 2030.
City Wide Guidance	Edinburgh Design Guidance – review to consider sustainability and climate change adaptation. This is currently underway and it will consider these issues.	Planning	In house	Review already underway. Bespoke guidance relating to rainwater management prepared and will be included in EDG.	Late 2022
Householders Applications	Householders guidance to be updated to cover issues such as green roofs, rainwater gardens, porous paving, surface water run-off planting schemes and renewable energy.	Planning	In house	Some areas of work already commenced.	Late2022
Climate Change Impact on WHS	Climate Vulnerability Index Project to consider the impact of climate change on the Outstanding Universal Value of the WHS	Planning working alongside HES	HES & University of Queensland	Workshops complete and findings being analysed and written up.	Report expected spring 2022
Listed Buildings	Strategy for Carbon reduction in Listed buildings	Planning - JB	Scot Gov appointed consultants	In preparation	Report expected spring 2022
Replacement Windows	Listed Buildings and Conservation Areas - guidance to be reviewed following research by HES to consider comparison of whole life cost and life cycle assessment of timber windows versus uPVC.	Planning alongside HES	HES	Research project due to commence early 2022.	To be confirmed with HES
Transport					

	Action	Lead	Resource	Action already completed	Timeframe
Transport Strategy	City Mobility Plan - Edinburgh's transport strategy for 2021 to 2030. Vision that "Edinburgh will be connected by a safer and more inclusive net zero carbon transport system delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents."	Transport/ Planning	In house	Approved Feb 2021. Contains 49 policies, some of which have already been actioned.	On-going
Air Quality	Low Emission Zone - aims to prevent the worst polluting vehicles from entering a defined area in the city, which in turn will reduce emissions and greenhouse gases in this locality.	Transport/ Planning	In house	Due to be reported back to T&E committee Jan 2022	Aim for enforcement to commence summer 2024
Water					
Water Vision	<p>Vision for Water Management Work with SW and SEPA to agree an overall Vision and Objectives for city concerning all aspects of flooding and sewer flooding, including ensuring Thriving Greenspace projects are utilised for water attenuation.</p> <p>Planning authority role in ensuring NPF4 National Project and all planning applications to comply with guidance and policy.</p>	Planning	In house - Planning and Flooding	<p>Edinburgh and Lothians Strategic Drainage Partnership involved</p> <p>Water Vision agreed at Transport and Environment Committee in November 2021.</p> <p>Guidance on Sustainable Rainwater management approved at T&E and Planning Committee. To form part of EDG.</p> <p>Fact sheets are underway with three completed and further two still to come:</p> <ul style="list-style-type: none"> Maintenance of 'green blue' water features with Abertay uni – in preparation 	To be carried out in line with the timescale for City Plan 2030.

	Action	Lead	Resource	Action already completed	Timeframe
				<ul style="list-style-type: none"> Suds and heritage - how to do water management above ground in heritage areas - in preparation 	
Integrated city wide strategy green/blue infrastructure	<p>Green Blue Network project and Active travel.</p> <p>City Wide strategy for active travel/ecosystem services combining with ENN /open space strategy information / water attenuation and flooding issues.</p> <p>Reduced sewer flooding (both surface water and combined sewers) opportunities for improving network and planning new infrastructure and missing links to be identified.</p>	Planning	<p>Managed in house - Planning</p> <p>Funded by SUSTRANS /SEPA /CEC</p>	<p>Recently identified as a National Planning project in NPF4 . Project currently requires further resource and consultation work within the officers of the council in many departments.</p> <p>Consultants to start 1/10/2020</p>	Completion Sept 2022
Surface Water and Flooding	Commission Surface Water management plans for city in a timely fashion - assessing these is an issue due to resources in Flooding, which in turn impacts on Planning if we don't have the required info.	Flood Prevention	Requires 3 F/T flood engineers	Certain SWMP have started but constrained by staff resource and finance	Interim Flood Risk Assessment for City will be used for LDP
Edinburgh Sustainable Water management guidance (Suds)	Provides guidance for all developments, both planning and transport on Suds and surface water	Planning / Flood Prevention	Consultants SUSTRANS funded	Completed - Finalist – landscape Institute Awards.	Complete
Costs on maintaining existing flood defence structure with climate change erosion not expected	Aims to understand risk of using hard engineered, especially coastal structures, as opposed to moving back development and soft solutions due to on-going maintenance costs.	Flood Prevention	Resource impacts to be identified.		<p>Input into Place Briefs</p> <p>On-going as required</p>

	Action	Lead	Resource	Action already completed	Timeframe
at time of construction					
Biodiversity					
Ecology and Ecosystem services	Edinburgh Nature Network (ENN) - City wide strategy for Ecosystem services and Habitat network. Identifying nature-based opportunities for single site interventions with multiple benefits for people and nature (e.g. enhancing habitat connectivity, providing mental health benefits, flood regulation etc.)	Parks, Open Space and cemeteries and Planning	In house - Part of the Thriving Green Spaces Future Parks Accelerator (FPA) project Funded National Trust and HLF/ Partnership with Scottish Wildlife Trust, Parks, open space and cemeteries	GIS and Ecosystem Services Consultant appointed	Report published April 2021. Extension requested for Phase 1 of project – this will allow piloting ENN opportunities Edinburgh Nature Network connectivity mapping will be included in City plan 2030 as part of the Green blue network for the city.
Biodiversity	Edinburgh Biodiversity Action Plan - updated annually City Plan 2030 - new biodiversity policy	Planning	In house - Planning	On-going New City Plan policy in preparation	To be carried out in line with the timescale for City Plan 2030.

	Action	Lead	Resource	Action already completed	Timeframe
Trees	1 Million Tree Project -	Parks, Open Space and cemeteries	In house – Planning asked to input	Agreed by committee Planning have been asked to record loss of trees and deliver 126,000 new trees in development schemes. This requires a resource.	On-going
Tree Canopy Target	<u>City Plan 2030</u> - new guidance to increase tree canopy cover in new public spaces and car parks – research required understand how to update existing information, measure this and set targets. To be done in Open Space Strategy and /or Edinburgh Design Guidance.	Planning	In house – Currently no resource identified	Discussions held with Glasgow City Council and discussion with Parks Dept - study required as evidence before input into new policy.	TBC when resourced
Resistant planting - disease and heat	Diversify planting species in the city to more appropriate trees and shrub species in all new development	Planning	In house		Complete
Planting - Human health	Species of tree and shrub planting to be altered to avoid highly allergenic pollen which causes asthma and hay fever made worse by higher temperatures.	Planning	In house	Discussions with Landscape Architects to ensure appropriate species. Changes to be included in revised EDG.	Late 2022
Planting - Human health	Grass species in pollinator grass mix used by Edinburgh Parks and requested in planning applications to be amended and highly allergenic grass species removed.	Planning	Edinburgh Design Guidance to be updated.	Positive Discussion held with British Seed Houses – UK manufacturer. Changes to be implemented through revised EDG	Early in Q2 2022

APPENDIX 2 - Detailed report on Planning policy and guidance in relation to Climate Change Emergency and Zero Carbon Development

1. Introduction

- 1.1 Scotland's climate is already changing. Over the last century temperatures have increased, sea levels have risen, and rainfall patterns have changed, with increased seasonality and more heavy downpours. The experience of recent years has shown us that climate change and extreme weather events have already impacted many aspects of our natural environment and our society, including buildings and property, health, agriculture and growing seasons, forestry, transport, water resources and energy demand. These changes are projected to continue and intensify over the coming decades.
- 1.2 The Council's planning response to the climate change emergency and zero carbon agenda sits within a hierarchy of planning policy, guidance and best practice advice.
- 1.3 The Council produces, and helps shape, a wide range of plans, policies and frameworks at the national, regional, citywide and local level. Planning authorities have a statutory function and must operate within this legislative hierarchy. Decisions must be guided by policies in the development plan.

2. Legislative Framework

- 2.1 Scottish Government's legislation, policy and priorities steer our own policies, guidance and decision making at a local level.

National

- 2.2 The [Climate Change \(Scotland\) Act 2009](#) sets a target of reducing greenhouse gas emissions by at least 80% by 2050.
- 2.3 The [National Planning Framework](#) (NPF) provides a statutory framework for Scotland's long-term spatial development. Draft NPF4 was published in November 2021 and is currently being consulted on. NPF4 will form part of the development plan and is a material consideration in assessing planning applications. It addresses a number of environmental issues:
 - nature recovery
 - future impacts of flood risk, temperature change, coast, infrastructure
 - heat networks
 - more sustainable travel
 - 20-minute neighbourhoods
 - an infrastructure-first approach
 - limiting greenfield development
 - limiting out of town retail
 - making use of vacant land
 - a positive, greener future

- 2.4 [Scottish Planning Policy](#) (SPP) is a statement of the Scottish Government's priorities and policies that will help to deliver the objectives of the NPF and is a material consideration with significant weight in planning decisions; it's also important guidance for plan-making. It contains subject policies on sustainability and placemaking, zero waste, the natural environment, flooding and drainage, green infrastructure, heat and electricity, and the historic environment.
- 2.5 Scottish Government also produce other thematic guidance including [Creating Places](#), [Designing Streets](#) and [Circulars](#). Circulars contain policy on the implementation of legislation or procedures.
- 2.6 [Cleaner Air for Scotland 2 – Towards a Better Place for Everyone](#) sets out the importance of improving Scotland's air quality and taking a precautionary approach when considering the effects of adverse air quality on health.

Regional

- 2.7 The first [Strategic Development Plan for South East Scotland](#) (SDP) was approved in June 2013. It provides a long-term (20 years plus) spatial planning strategy for the Edinburgh city region, including where future development will be located and what is required for its delivery.
- 2.8 The SDP, together with the local development plan and any associated supplementary guidance, form the statutory development plan referred to in decisions on planning applications.
- 2.9 SDP1 is accompanied by an Action Programme of projects essential to unlocking sustainable growth and delivering the SDP's regional vision.
- 2.10 A second proposed Strategic Development Plan was submitted to Scottish Ministers for examination in June 2017 but was subsequently rejected by Scottish Ministers in May 2019.
- 2.11 As part of Scottish Government's [Planning Reform](#), SDPs are being replaced by regional spatial strategies. An [Interim Regional Spatial Strategy for South East Scotland](#) has been submitted to Scottish Ministers.
- 2.12 The [Regional Transport Strategy](#) (RTS) is produced by SEStran. The current RTS was first produced in 2008 and updated in 2015.
- 2.13 A draft RTS was published by SEStran in November 2021 and sets a sustainable transport framework to 2035.

Local

- 2.14 The Local Authority has a statutory duty to produce a development plan. The current [Edinburgh Local Development Plan](#) (LDP) was adopted on 24 November 2016. It is accompanied by twelve pieces of Supplementary Guidance and these also form part of the statutory development plan.
- 2.15 The Plan is used to determine planning applications and is accompanied by a statutory [Action Programme](#) which ensures delivery of the plan's policies and proposals, including necessary infrastructure.

- 2.16 The emerging replacement LDP [City Plan 2030](#) sets out the strategy for development, proposals and policies to shape development and inform planning decisions in the city over the next 10 years and beyond. Following a period of consultation, the Council are currently considering the representations received prior to submitting the Proposed Plan to Scottish Ministers in 2022.
- 2.17 Alongside the LDP and supplementary guidance sits our non-statutory guidance. The non-statutory guidance supports the policies in the LDP and is a material consideration in determining planning applications, and includes: [Listed Buildings and Conservation Areas](#); [Householders](#); [Businesses](#); [Development in the Countryside & Green Belt](#); [Edinburgh Design Guidance](#); [Flooding](#); [Open Space Strategy](#).

3. City of Edinburgh Council Planning Policies and Guidance

- 3.1 The planning authority is acutely aware of the issues around climate change and has, for decades, been setting policy and preparing guidance to assist in creating more sustainable, accessible and greener places.
- Local Development Plan**
- 3.2 One of the five [Local Development Plan 2016](#) (LDP) aims is to 'look after and improve our environment for future generations in a changing climate'. Part 2 of the plan includes a section on Climate Change and provides an overview of how the plan's strategy and policy framework address the reduction of greenhouse emissions and ability to adapt to a changing climate.
- 3.3 The key policy to support the aim of reducing emissions and energy use is LDP Policy Des 6 Sustainable Buildings. This policy addresses the knowledge that buildings account for a substantial proportion of total carbon emissions through the energy they consume. This policy requires new development to demonstrate meeting the target for carbon dioxide emissions, and the use of low and zero carbon generating technologies. These targets are set by the Building (Scotland) Regulations 2004.
- 3.4 The LDP also provides examples of design features to be incorporated into new development that would reduce or minimise environmental resource use, these include water conservation, SuDS, recycling, sustainable materials and facilities to support active travel.
- 3.5 Planning guidance requires applicants for non-householder development to complete a 'S1 Sustainability Statement Form' to demonstrate compliance with LDP Policy Des 6.
- 3.6 Further guidance can be found in the [Edinburgh Design Guidance](#), which sets out guidance for a better understanding of how development can reduce energy in new buildings.
- 3.7 Alongside the LDP sits the Action Programme 2016. It identifies the actions required to deliver the Plan. Many of these actions refer to active travel

requirements to reduce the impact of new development on the road network and to encourage more sustainable modes of travel, such as walking and cycling.

- 3.8 Not all of the actions have been secured through legal agreements, nor are they able to be delivered directly through development. Some rely on funding sources from capital budgets or other partner funding. The financial modelling of the LDP Action Plan identifies where there are gaps in funding to enable the actions to be delivered.

City Plan 2030

- 3.9 City Plan 2030 was approved as the Council's next Proposed Local Development Plan by Planning Committee on 29 September 2021. It supports the Council's target for Edinburgh to become a more sustainable place and a net zero city by 2030. It focuses on:
- A sustainable city which supports everyone's physical and mental wellbeing.
 - A city where you don't need a car to get around.
 - 20 minute neighbourhoods and the creation of high quality, high density, mixed use, walkable communities, linked by better active travel and public transport infrastructure with green/blue networks.
 - The use of Brownfield rather than Greenfield.
 - Requires all new buildings through their fabric, design and use of low and zero carbon to address climate adaptation.
 - Implementing environmental policies to deal with climate change mitigation and adaptation, protecting Edinburgh's green setting, increasing biodiversity, physical and mental wellbeing, reducing flooding and other climate impacts and improving air quality.
- 3.10 City Plan states that the future growth of our city must meet our ambitions to be a climate ready city where new homes are built to the highest emissions quality standards, in the right locations and with the right infrastructure as part of resilient, connected neighbourhoods. Work has already started on the [20 minute neighbourhood](#) concept with projects being identified across the city.
- 3.11 A key part of the plan is the requirement for all new buildings to be net-zero in their operational greenhouse gas emissions. Primarily this should be achieved through built fabric efficiency and design. However, there is also a role for the use of low and zero-carbon generating technologies, particularly around heat networks and energy infrastructure.
- 3.12 City Plan 2030 will be submitted to Scottish Ministers in 2022. The Scottish Government will then produce an Examination Report advising whether the Council can adopt the Plan and if modifications should be made. Subject to this, the Council can then adopt the Plan and begin fully implementing it.
- 3.13 To support City Plan 2030, planning will be updating and adding to its guidance, providing detail on how to implement the policies to create more sustainable places. Some of this work will represent updates to existing guidance, and some will be

new guidance, for example in relation to green roofs and place briefs for brownfield sites, where development principles for each site covering green/blue infrastructure, active travel, SUDS, trees and biodiversity will be prepared.

Built Heritage and Environment

- 3.14 In the future, we expect historic buildings to deteriorate faster due to increased rainfall and more frequent extreme weather events, which makes taking preventative measures now more critical than ever. Climate change will pose many threats to the World Heritage Site (WHS), parts of which have survived for over 900 years.
- 3.15 Edinburgh World Heritage Trust (as lead), Historic Environment Scotland (HES), University of Edinburgh, the Council and Sniffer, through [‘Edinburgh Adapts’](#), are working together to prepare a methodology for assessing the impact of climate change on the WHS: this is yet to be published, but the findings will assist in preparing guidance that considers how best to preserve our buildings, whilst adapting to climate change.
- 3.16 Planning’s Edinburgh World Heritage Site co-ordinator has worked closely with HES, in collaboration with the James Cook University of Queensland, to establish the impact of climate change on the Outstanding Universal Value of the WHS. This is the first time the methodology, referred to as the [Climate Vulnerability Index](#) (CVI), has been applied to an urban WHS. The findings will be published early in 2022 and will also help inform future guidance on adapting our built heritage assets to cope with climate change.
- 3.17 Edinburgh World Heritage Trust (EWHT) has published a [Climate Manifesto](#), which addresses the challenge of becoming carbon neutral by 2030, while also stressing the importance of preserving the ‘heritage values’ of the Old and New Towns World Heritage Site.
- 3.18 HES [Climate Action Plan](#), also covers adaptation and carbon management, amongst many other topics.
- 3.19 HES and EWHT have produced a practical maintenance guide for home owners that provides practical and effective solutions designed for property owners to help them ensure that their historic homes and businesses are climate ready: [Guide to Building Maintenance in a Changing Climate](#) .
- 3.20 Research conducted in 2016 found that a poorly maintained building can result in higher fuel bills of up to +15% in some cases, which in turn increases the building’s carbon footprint. By ensuring a property is wind and water tight this will improve energy efficiency. Repairs and maintenance include stonework, chimney heads and gables, overhauling roofs, gutters and flashings and repairing and maintaining rainwater goods and timber-framed windows.
- 3.21 HES has carried out numerous conservation projects across Scotland that consider subtle ways of preserving and adapting historic properties to ensure they are fit for purpose and will hopefully survive for many more years to come. These practical

solutions have been published in a number of guidelines aimed at property owners to assist them in protecting and maintaining their own historic assets.

- 3.22 In partnership with a wide range of specialist organisations, HES will continue its technical research, which in turn will provide sound guidance and advice for both planning authorities and property owners. As a planning service we maintain strong working links with HES and will review and adapt our policies and guidance accordingly.

Windows in Listed Buildings and Conservation Areas

- 3.23 The planning authority receives large numbers of applications for replacement windows both in Listed Buildings and Conservation Areas. Applicants will often cite prohibitive costs of replacement timber windows and the need to improve energy efficiency as the reason for choosing uPVC. Our current guidance does not permit uPVC units within listed buildings, nor in conservation areas.
- 3.24 Research carried out by Heriot Watt University in 2013 looked at the life cycle assessment and whole life cost of a timber window in comparison to a uPVC window. The findings stated that there was inherently less embodied carbon contained within good hard wood timber sash and case windows due to their ability to be maintained and repaired, which gives them a long life span of 60 plus years.
- 3.25 The findings suggested that the installation of uPVC would deliver the opposite impact in terms of sustainability and the carbon used in the manufacturing process. Furthermore, uPVC windows are a whole unit and generally the component parts are not able to be replaced, resulting in the unit having a finite lifespan of approximately 20 years, before having to be replaced.
- 3.26 In addition to this, the detailing on uPVC windows, may result in a significant difference in appearance to the traditional timber sash and case units. This has an adverse impact on the character and appearance of both the building and the area, particularly where the uniformity of the windows is a significant feature of the development.
- 3.27 Where a planning judgement concludes that the removal of timber sash and case windows and their replacement with uPVC is unacceptable, applicants are encouraged to look into alternative mechanisms to improve the thermal efficiency of their windows. These would include draft proofing, shutters, blinds and secondary glazing systems that can be installed behind and within the existing window frame.
- 3.28 Notwithstanding our current guidance on replacement windows, technological advances suggest that there have been improvements in both the manufacturing of uPVC windows and their form and detailing. At the start of 2022, Historic Environment Scotland is proposing to undertake a research project to, once again, consider and make comparisons between the life cycle assessment and whole life cost of a traditional timber casement window and a modern replacement uPVC window. Dependant on the findings from this project, and in collaboration with HES, our current guidance on replacement windows will be reviewed.

Built Environment

- 3.29 In order to achieve the Council's net-zero carbon aspirations, it is recognised that we need to understand the embodied carbon within our existing buildings, particularly where demolition and redevelopment is proposed.
- 3.30 City Plan 2030 aims for all new buildings to be net-zero carbon through their built fabric and design, and their operational greenhouse gas emissions, but where new development includes demolition, the contribution the existing building can make should not be overlooked. These buildings may contain recyclable or reusable materials, or their retention and repurposing may better achieve the net-zero carbon aims.
- 3.31 Due to permitted development rights that allow the demolition of buildings without requiring planning permission, the planning authority may not always have control over this matter. This issues requires further consideration and guidance to support the City Plan policies.
- 3.32 In line with City Plan 2030, and Government's commitment to reduce the use of fossil fuels for heating, the future of gas boilers is uncertain, and consideration needs to be given to new methods of heating our buildings, such as ground or air source heat pumps and electric storage heaters. A ban on gas and oil boilers is likely by 2025. Installing these technologies into new developments may then become the norm but retrofitting older buildings will be more difficult due to the building design, structure and materials. Unless homes are correctly sealed, insulated and ventilated, these technologies will not be an efficient alternative.
- 3.33 Further research is required to explore alternative heating methods for our existing buildings, but also to ensure they are properly insulated. Historic Environment Scotland has carried out a number of projects within their properties to examine different methods of insulating and draughtproofing. This guidance is available on its website.
- 3.34 A review of the [Edinburgh Design Guidance](#) with regards to sustainability and climate change adaptation is currently underway and will consider these issues. It is anticipated that this will be reported to the Planning Committee later in 2022.

Permitted Development Rights and Householder Developments

- 3.35 The 2011 Census recorded 230,000 households in Edinburgh, of which 147,500 were in flatted developments. These figures will have continued to increase over the last 10 years.
- 3.36 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992, as amended, allows significant levels of development within the grounds of a dwellinghouse and, to a lesser extent, within the grounds of a flatted development. This can range from extensions, to outbuildings, to hard landscaping and hardstandings, all of which have the potential to remove green open space and replace it with hardsurfacing. Whilst each individual development may not seem significant, the cumulative effect on surface water run-off and biodiversity is evident.

- 3.37 Where the Planning Authority does have control, greater consideration should be given to including green roofs on extensions, disconnecting rain water pipes to reduce the flow of rainwater into the drainage system and diverting this instead into rain water gardens, porous paving wherever possible to prevent surface water run-off and promote natural drainage, renewable energy technologies and garden layouts and planting schemes that promote biodiversity. The preparation of guidance relating to some of these issues is already underway and will form part of the Edinburgh Design Guidance review, as well as being incorporated into the Guidance for Householders, which will also be reviewed later this year.

Transport

- 3.38 City Plan 2030 spatial strategy has been informed by both a [Strategic Sustainable Transport Strategy](#) and a full [Transport Assessment](#). These are both focussed on how to support the growth of the city and City Plan 2030's spatial strategy and development proposals with a shift from reliance on private car use to public transport and active travel. Part 4 – Proposals of the proposed plan sets out active travel and public transport safeguards and proposals to mitigate the impact of development and ensure that development is well connected to the active travel network. City Plan and its transport assessment is aligned with the policy measures and implementation plan of the [City Mobility Plan](#).
- 3.39 The [City Mobility Plan](#), approved in February 2021, is Edinburgh's transport strategy for 2021 to 2030. The Plan's vision is that "Edinburgh will be connected by a safer and more inclusive net zero carbon transport system delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents."
- 3.40 The City Mobility Plan comprises 49 policies under the themes of People (the policies that aim to improve health, wellbeing, equality and inclusion), Movement (policies that support inclusive and sustainable economic growth and respond to climate change) and Place (policies that help to protect and enhance our environment). It is the overarching policy framework for a series of action plans (active travel, parking, road safety, public transport etc) and policies, many of which are already being delivered, and some of which are new and are not yet underway.
- 3.41 For example, policy MOVEMENT 19 Mobility Hubs, aims to identify opportunities for mobility hubs in existing communities and major new developments that provide a range of sustainable travel choices and amenities including public transport, shared mobility, click and collect and electric vehicle charging. Policy PLACE 2 20-Minute Neighbourhoods, aims to support the 20-minute neighbourhood concept to underpin local communities and reduce the need for longer distance journeys. The Granton Waterfront team are looking to incorporate a mobility hub within their plans. A team is currently being created to deliver the Council's 20 minute neighbourhood aspirations, which is aligned with City Plan 2030.
- 3.42 The process of updating the implementation plan has already commenced. This will assess which policies are underway or already being delivered and where there are gaps in delivery, and therefore a need for policies to be assigned and resourced.

- 3.43 The Council is proposing to implement a [Low Emission Zone](#) (LEZ) in Edinburgh, with a view to enforcement beginning in summer 2024. The Council is working with Transport Scotland, Aberdeen, Dundee and Glasgow to ensure a consistent approach across the four largest cities in Scotland. The aim of the LEZ is to prevent the worst polluting vehicles from entering a defined area in the city, which in turn will reduce emissions and greenhouse gases in this locality.
- 3.44 The success of the LEZ is also reliant on a good public transport system and opportunities for active travel, which links to the LDP Action Plan.
- 3.45 [Edinburgh City Centre Transformation Strategy](#) aims to change the way we move around our city and our city centre, by providing more space for pedestrians and cyclists. Trials took place in 2019 prior to the pandemic to envision how these spaces could work.

Water and Blue/Green Networks

- 3.46 Water is the most significant issue in terms of climate change events, from drier summers, to wetter winters, increased rainfall, increased flooding incidents and rising sea levels. The Scottish Government recognised the need to take a regional approach to flooding, drainage, water quality and the wider consideration of the water environment and established the Edinburgh and Lothians Strategic Drainage Partnerships (ELSDP) in October 2019.
- 3.47 The Partnership seeks to develop a co-ordinated and transformative approach across Edinburgh and the Lothians to drainage, water management and flooding issues. There is a strong focus on water management using above-ground drainage infrastructure (or Sustainable Drainage Systems; SuDS), increasing biodiversity, creating great places and supporting a climate-resilient city region.
- 3.48 Approved in November 2020, the [Vision for Water Management](#) in the City of Edinburgh (Water Vision) is being actively driven forward by the Blue Green City Partnership (BGCP). This is a partnership between Scottish Water (SW), Scottish Environment Protection Agency (SEPA) and the Council. This group reports to the Edinburgh and Lothians Strategic Drainage Partnership (ELSDP).
- 3.49 [Edinburgh's Sustainable Rainwater Guidance](#) (ESRG), is proposed to form part of the Edinburgh Design Guidance and Street Design Guidance. It provides general principles and good practice advice, accompanied by factsheets on specific solutions such as Green Roofs, Rain Gardens and street trees and is aimed at developers, designers and Council officers. The ESRG will also help to explain the proposed new City Plan 2030 policies on surface water management.
- 3.50 Sustainable Urban Drainage (SuDs) is one aspect of Blue-Green infrastructure (BGI) and includes rain gardens, grass swales, ponds and various other structures aligned to provide staged treatment in terms of water quality and reduced flow rates/storage, thereby reducing flooding. When designed well Suds can also achieve much wider place-led benefits, including supporting biodiversity, providing attractive open/play space and complementing mobility and active travel.

- 3.51 In June 2021, The Council launched the draft 2030 Climate Strategy; Delivering a Net Zero Climate Ready City for consultation. This also embeds the work of the Water Vision and ESLDP. The aims of the ELSDP, the Water Vision and Climate Strategy also align with the Edinburgh Climate Change Commission which states that the City should become resilient to climate change, embed a collaborative approach to problem solving and be open to all best practice. This also accords with the Council's [Edinburgh 2050 Vision](#) of a sustainable, green, and safe city.
- 3.52 The [Edinburgh Adapts Climate Change Adaptation Action Plan](#) (EACCAAP) contains twenty-two actions that are linked to flooding and water and many others relating to biodiversity and greenspace actions.
- 3.53 Delivery of exemplar retrofit and new development projects are key to demonstrating how the Water Vision and City Plan 2030 policies can be implemented. The focus is on surface water and flood risk management, whilst linking with other related 'place-led' deliverables, such as biodiversity, active travel, attractive landscapes/townscapes and community cohesion. Engagement with a wide range of stakeholders, including residents, communities, business, other public agencies is required.
- 3.54 The '[Green/Blue Network](#)' project, brings together active travel, footpath networks, biodiversity and 'water' networks alongside green open space and planning information. This provides us with an understanding of the City's green/blue network and opportunities for new multifunctional green-blue infrastructure. The finalised document is expected in March 2022.

Biodiversity

- 3.55 The [Nature Conservation \(Scotland\) Act 2004](#) requires public bodies to further the conservation of biodiversity when carrying out their responsibilities. The [Wildlife and Natural Environment \(Scotland\) Act 2011](#) requires the authority to publish a report every 3 years on the actions they have taken to meet this biodiversity duty; this is demonstrated in our [Biodiversity Duty Report](#).
- 3.56 [Edinburgh Biodiversity Action Plan](#) – provides an overarching vision statement for biodiversity in Edinburgh. The next iteration is currently being drafted and will include up to 2030 green and blue infrastructure, adaption solutions such as rain gardens, SuDs, biodiversity rich landscape schemes, native grasslands, trees, ponds, as well as artificial structure for species such as bats and birds.
- 3.57 City Plan 2030 has specific policies which support and protect biodiversity in the city.
- 3.58 The Planning (Scotland) Act 2019, requires authorities to prepare a Forestry and Woodland Strategy. Work on the Strategy is underway, for publication in late 2022.

4. Other relevant CEC strategies and Partnership Working

- 4.1 Much of the work Planning is progressing dovetails with other council strategies, such as [Council Business Plan 2021](#), [Adaptation and Renewal Programme](#) and [Edinburgh's economic Strategy](#) all of which aim to end poverty and support a green, resilient, and fair economy.
- 4.2 The [2030 Climate Strategy](#) published in December 2021 is leading action for change across Edinburgh by identifying the actions needed to reduce greenhouse gas emissions by 2030.
- 4.3 The Council is also a full partner in [Edinburgh Living Landscape](#) - a network for nature in the city that aims to make the capital one of the most sustainable in Europe by 2050.
- 4.4 The Planning service also works closely with other council services, public bodies, statutory undertakers and stakeholders, as evidenced through this report.

5. Constraints

- 5.1 The Planning Authority operates within a legislative framework, which may influence our ability to exercise control over development, for example when permitted development rights apply. On occasions other legislation may also constrain actions, such as the Building Regulations or the Transport Act. There is a need to be mindful of these.

6. Implementation

- 6.1 Residents, business and other stakeholders have a significant role to play in the implementation of climate change policy and achieving net-zero carbon aspirations.
- 6.2 Whilst the council establishes policy and guidance, and leads with demonstration projects, the biggest impact will come from those who own, or have an interest in, the built and natural environment implementing policies and best practice.

7. Financial Assistance

- 7.1 Warmer Homes Scotland is a Scottish Government funded scheme to assist with making improvements to homes to reduce fuel bills. The following websites offer advice and information:
 - [Energy Saving Trust Scotland](#) helps you save energy and reduce your bills.
 - [Greener Scotland](#) gives advice on how to save energy, reduce waste, travel smarter and eat greener.
 - [Age Scotland](#) has guidance on energy and how to reduce your bills.
 - [Fuel Bank Foundation](#) has advice for managing your energy account.

8. Conclusion

- 8.1 This report demonstrates the breadth of work that is already underway within the planning service, and in collaboration with other council services, external agencies and stakeholders, to meet the climate change challenge and work towards the Council's aim to be net-zero carbon by 2030.
- 8.2 The climate change agenda is vast and requires significant research and investment. Technologies are constantly improving and working alongside other council services and our partner organisation, we aim to continually review and update our policies and guidance to reflect emerging best practice and technological advances.