

## **Appendix 1: City Plan 2030 Schedule 4 Forms**

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<b>Issue 1</b>	<b>Introduction and Aims</b>	
<b>Development plan reference:</b>	Part 1 Introduction and Part 2 Strategy p8-p38	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> Adam Richardson (0590)  Alexander Sutherland (0193)  Andrew Anderson (0535)  Andrew Heald (0566)  Andy Inglis (0138)  Anna Brand (0742)  Anne Wellman (0229)  Archie Clark (0003)  AREAA (0358)  Arnold Clark Automobiles Ltd (0750)  Arnold Myers (0758)  Astley Ainslie Community Trust (0318)  Bo Adams (0363)  Brian Tiplady (0641)  Brian Smith (0333)  Carol Duncan (0143)  Carolyn Wilson (0134)  CBRE Global Investors (0644)  Cockburn Association (0777)  Cramond &amp; Barnton Community Council (0243)  Crosswind Developments (0184)  Dave Berry (0463)  David McGowan (0168)  David Price (0224)  Derek Mitchell (0171)  Des Hackett (0125)  Desmond Docherty (0485)  Douglas Tharby (0148)  Dr David Houston (0655)  Dr Helen Forrest (0315)  Dr Jane Gear (0487)  Dr Tim Duffy (0503)  Dunedin Canmore Housing Limited (0766)  Edinburgh Access Panel (0620)  Edinburgh BioQuarter Partners (0478)  Edinburgh Chamber of Commerce (0379)  Edinburgh Napier University (0731) </div> <div> Michelle Mckinley (0432)  Mike Richardson (0109)  Mr John G. Skinner (0065)  Mr T Klan (0307)  Murray Estates (0197)  National Galleries of Scotland (0725)  NatureScot (0528)  Neil Ross (0610)  New Town and Broughton Community Council (0254)  NHS Lothian (0596)  Nicholas Hepworth (0052)  Nicola McCowan Hill (0195)  Nikki Sinclair (0337)  Nuveen Real Estate (0564)  Nuveen Real Estate (0734)  Oliver Glencross (0489)  Patricia Willder (0205)  Peter Allen (0336)  Peter Fantes (0319)  Portobello Community Council (0206)  Queensferry &amp; District Community Council (0568)  Ratho and District Community Council (0289)  Robert Falcon (0640)  Robyn Kane (0091)  Roger Thomas (0345)  RSPB Scotland (0648)  Sarah Adamson (0523)  Scottish Government - Planning and Architecture Division - Development Plans Team (0309)  Scottish Water (0342)  Scottish Wildlife Trust Lothian Group (0560)  SEPA (0012)  Sergey Gorobets (0414)  Sheila Chapman (0157)  Shelagh Sharp (0111) </div>		

<p> Edinburgh World Heritage (0339)  Elspeth Wills (0293)  Fiona Macleod (0505)  Fiona Wragg (0780)  Fife Council (0514)  Frances Guy (0589)  George W S Heatley (0009)  Gilmerton &amp; Inch Community Council (0716)  Goff Cantley (0032)  Gordon McKay Brown (0573)  Graeme Parry (0230)  Graham Miller (0158)  Grange/Prestonfield Community Council (0192)  Hallam Land Management (0615)  Hazel Macaulay (0178)  Homes for Scotland (0404)  Iain Morris (0431)  Ian Ross (0423)  Ian Thompson (0406)  Jay Chimo (0674)  Jean Morley (0461)  Jennifer Hess (0771)  Jennifer Inglis (0437)  Jim Baird (0001)  John Bremner (0140)  John Martin (0008)  John Torrance Glencross (0509)  Judith Webber (0104)  Julie Robertson (0210)  Juniper Green and Baberton Mains Community Council (0306)  Kathryn Poolman (0574)  Kim Denholm (0294)  Lady Road Investment S.A.R.L. (0625)  Leith Central Community Council (0614)  Leith Harbour and Newhaven Community Council (0776)  Leith Links Community Council (0617)  Liberton &amp; District Community Council (0084)  Liz Glass (0645)  Lynn Grattage (0362)  Mactaggart &amp; Mickel Homes Ltd (0312)  Mark Ockendon (0419)  Melford Developments Ltd (0308)  Michael Adrian Hall (0261)  Michael Ramsay (0011) </p>	<p> Shortbread House (0619)  Simon Thomson (0248)  Southside Community Council (0781)  Sport Scotland (0671)  Steve Loomes (0767)  Stewart Milne Homes (0118)  Stirling Developments (0303)  Susie Ross (0440)  Tarmac (0244)  Tessa Haring (0112)  The Association for the Protection of Rural Scotland (0334)  The Davidsons Mains and Silverknowes Association (0454)  The Friends of Midmar Paddock, Edinburgh (0121)  The Royal London Mutual Insurance Society Ltd (0149)  Thomas Tierney (0400)  Tiger Developments Ltd (0602)  Tony Gray (0291)  University of Edinburgh (0464)  Visit Scotland (0689)  West Town Edinburgh Ltd (0660)  William Moyes (0305)  Wright PDL (0078) </p>
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<b>Provision of the development plan to which the issue relates:</b>	This section of the Plan sets out the introduction, strategy, aims and outcomes of City Plan 2030.
<b>Planning authority's summary of the representation(s):</b>	
<p><u>Adam Richardson (0590) – support</u></p> <p>Supports City Plan Aims 1 and 2 as they are fundamental to Edinburgh's sustainable development</p> <p><u>Anne Wellman (0229) – support</u></p> <p>Support the retention of all green space in Edinburgh.</p> <p><u>Brian Smith (0333) -support</u></p> <p>Considers that the 20 minute walkable neighbourhoods are so important to reducing car use and the various positives that generates as well as promoting society based around neighbourhoods.</p> <p><u>Carol Duncan (0143) -support</u></p> <p>Supports City Plan 2030, including local place plans, encouraging active travel routes and walkable neighbourhoods. Supports climate mitigation and sustainability City Plan policies. Concerned about the energy use of buildings and the energy requirements of building new buildings.</p> <p><u>Carolyn Wilson (0134) -support</u></p> <p>Support the retention of all green belt Spaces, Local Nature Conservation Sites, allotments and heritage sites.</p> <p><u>Dave Berry (0463) -support</u></p> <p>Supports strategy and aims. Net zero and 20 minute neighbourhood objectives are vital and considers that the Plan addresses this.</p> <p><u>David Price (0224) -support</u></p> <p>Supports strategy and aims and feels passionately that access to green space is essential for everyone's physical and mental well-being. Areas like Midmar Paddock and Cammo Park are there for everyone.</p> <p><u>Desmond Docherty (0485)-support</u></p> <p>Strongly support the commitment to sacrifice no green belt land for development in plan period. LEZ scheme needs to be well enforced with appropriate pricing.</p> <p><u>Derek Mitchell (0171) -support</u></p> <p>Supports the policies aims of protecting greenspace with Edinburgh.</p> <p><u>Des Hackett (0125) -support</u></p>	

Strongly supports the Plan in its emphasis on protecting greenfield land, measures for more sustainable housing, transport etc and the protection and enhancement of the natural environment.

Dunedin Canmore Housing Limited (0766)-support

Agrees that the City Plan reflects national, regional, and council strategies.

Agrees that the city must also be part of a green recovery by being proactive in reversing biodiversity loss and maximising the wider benefits of nature through improving greenspaces as well as the accessibility of these spaces to enhance physical and mental wellbeing.

Edinburgh BioQuarter Partners (0478) -support

Broadly support all of para 2.2. Notes that the Edinburgh BioQuarter will encompass many, if not all, the listed aims. Notes that EBQ's partner's Place Strategy 2021 are consistent with the aims listed in para 2.2 as demonstrated in table 1 of the attached submission.

Fiona Macleod (0505) -support

Supports strategy and aims and emphasises the benefits of greenspace for wellbeing.

Fiona Wragg (0780) -support

Ensuring that all residents of Edinburgh, regardless of income or situation, have access to services, green space and decent affordable housing is essential. This plan acknowledges that need for equity of access, as well as the need for change.

Fife Council (0514)

No objection to plan.

George W S Heatley (0009) -support

Supports plan as green spaces are beneficial to the mental and physical health of residents and visitors. The extent of greenspace provided in the Plan is proportionate to the urban area of the city.

Gordon McKay Brown (0573) -support

Support zero and sustainable transport strategy.

Graham Miller (0158) -support

Supports the aim of "Directing new development to, and maximising the use of, brownfield land rather than greenfield land..." the long-term development strategy for Scotland, in particular Outcome 3. This is important in high density urban areas to meet the Programme for Government objective of promoting lifelong health and wellbeing. Supports the outcome that Edinburgh is a sustainable city which supports everyone's physical and mental wellbeing as this is vital to ensure sustainable communities and equality of outcome for different groups and places. Notes that there are two areas of greenbelt within the city, Holyrood Park; and Blackford and Braid Hills, supplemented by larger and smaller

areas of greenspace and these must be preserved, and the use of brownfield land maximised. Support in particular the Outcome that Edinburgh is a sustainable city which supports everyone's physical and mental wellbeing. The green belt is important for this.

Hazel Macaulay (0178)-support

Green spaces within the city are crucial for resident's health and wellbeing, as evidenced during the pandemic. Strongly support any proposals which preserve green spaces.

Iain Morris (0431) -support

Supportive of strategy, particularly of site BGN 26 Green Blue Network proposal.

Ian Ross (0423) -support

Support strategy and aims but expresses disappointment at how long it has taken to amend piecemeal approach to development around the city.

Ian Thompson (0406) -support

Supports strategy and considers the need to grow as housing needs increase is important but it must be done with a view to protect what makes Edinburgh such a special place to live, work and play and better use of brown field sites is vitally important.

Jim Baird (0001) -support

Support for 20 Minute neighbourhoods. Support for local businesses would improve the sense of place in 20 minute neighbourhoods.

Judith Webber (0104) -support

Supports strategy and think it is really important that green spaces are valued and maintained in the city. They contribute hugely to the mental and physical health of the population as well as being vital for the environment, climate control and biodiversity.

Kim Denholm (0294) -support

Supports the retention of as much green space in Edinburgh as possible.

Lady Road Investment S.A.R.L. (0625)-support

Supports many of the policies in City Plan 2030 relating to the use of brownfield land and encourages a flexible approach to the type of new uses supported on these sites as they come forward. Supports Aims 1, 2 3, 4, 8 and 10.

Liberton & District Community Council (0084) -support

Supports section of the plan.

Michael Adrian Hall (0261) -support

Agree in principle with the Introduction to City Plan 2030

National Galleries of Scotland (0725) -support

Supports the aims of City Plan 2030 particularly aims 1, 2 and 4. These align well with NGS's proposals to redevelop The Art Works, Granton site.

Neil Ross (0610) -support

Supports spatial strategy

Nicholas Hepworth (0052) -support

Supportive of protecting greenspaces in Edinburgh, improving sustainability performance, and improving the wellbeing of the population. Edinburgh exhibits global leadership with the Plan by protecting greenspace and allowing development only on brownfield sites; reducing traffic; increasing growing areas for communities; community heating; improving insulation; provision of recreational facilities for young people.

Nikki Sinclair (0337) -support

Supports cross cutting policies around net zero and 20 minute neighbourhoods. Supports policies around protecting green belt in order to deliver objectives of City Plan.

Portobello Community Council (0206) – support

Portobello Community Council consulted our local community on the Main Issues Report, focussing on where new housing should be delivered. Response indicated support (71%) for prioritising brownfield development. This is reflected in the proposed plan.

Scottish Water (0342) -support

Support introduction, aims, strategy and outcomes.

Sheila Chapman (0157) -support

Support the plan, especially to protect places of value and to preserve green space to ensure a good quality of life for everyone. Considers green belt areas important wellbeing and it is extremely important to protect local nature areas.

Shelagh Sharp (0111) -support

Supports strategy and 20 minute neighbourhoods.

Tiger Developments Ltd (0602), Arnold Clark Automobiles Ltd (0750)– support

Supports Aim including 1, 2, 3, 4, 8 and 10.

Tony Gray (0291) -support

Supports City Plan 2030 in general. The previous LDP allowed too much green belt land to be developed, particularly in SE Edinburgh, allowed too much development without supporting infrastructure, and delivered insufficient affordable housing.

Visit Scotland (0689) -support

Pleased to see recognition of the need to develop areas of the city where tourism development can still expand, for example, the Waterfront which will allow for a further distribution of visitors to the city in peak times. Agree with outcomes that seek to protect

the historic and natural environments from inappropriate development and welcome the recognition that both environments play an important role in enhancing the quality of life of residents and the city's appeal as a place for tourism and investment. Welcomes the inclusion of strategic projects and safeguards for active travel.

#### West Town Edinburgh Ltd (0660) -support

Support aims that: create 20-minute walkable neighbourhoods; a 'place based' approach to development; deliver new communities in West Edinburgh; create sustainable communities, build net-zero; mitigation and adapt to Climate change; Integrate infrastructure with place making; Provide an appropriate level of affordable housing; and Deliver on Edinburgh's key economic land use needs. Supports the principle of addressing the impacts of climate change, contributing to the delivery of a net zero city by 2030.

### **Plan Format and Mapping**

#### Archie Clark (0003)

Notes the similarity in paragraph 2.141 between the first and fourth sentences.

Notes that maps on page 23 are difficult to read. Notes that there is no map of the 22 Special Landscape Areas being designated, as referred to in paragraph 2.66.

Plan is complex and difficult to use, discriminating against those without access to a computer and internet. Change to a single plan covering the whole Edinburgh area creates a unwieldy document. The Plan needs to be made much more flexible for example with a inclusive 'strategic plan' for general items and truly 'local plans' for the separate parts of Edinburgh. The local parts could be dealt with by separate local town halls who have an understanding of local issues and react more quickly. Document is hard to read and full of jargon.

Considers sustainable development definition should be revised so that it includes reference to the 13 principles included in the Scottish Land Use Strategy.

#### Crosswind Developments (0184)

Quality of both Map 1 and Map 2 is poor and renders the map to a degree unreadable. The maps in this section would benefit from having policy references to aid the reader.

#### Dr Helen Forrest (0315)

The whole plan is much too long and complicated. The diagrams are much too difficult to read and there is too much jargon in the whole document.

#### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Site briefs should contain all information for that location in one place – including place names, map references, project references, housing allocation and any other reference numbers associated with that place.

#### Edinburgh World Heritage (0339)



Reference should be made at paragraph 3.3 as to the importance and method of engaging the local community and wider stakeholders in the development of principles for development of their areas.

Note that there are a number of references relevant to the historic environment missing within this glossary and advise that reference is made to previous Council documents to include and define relevant historic environment terms.

Note numerous good references to the skyline study and protected city views in Appendix D however advise that appropriate overarching reference is made in the appropriate place within the Plan referring to the Edinburgh Design Guidance, associated study and views for protection.

#### Hallam Land Management (0615)

Map 1 Spatial Strategy (Illustrative), appears to be inaccurate in parts and Map 2 Spatial Strategy (Technical) is intelligible and lacks clarity in geographical and policy terms.

#### Juniper Green & Baberton Mains Community Council (0306)

Plan is difficult to comment on as there are variations in layout, different map types, missing maps, maps that are too small to read, and maps lacking annotation, inconsistency in listing typos, complex sentences prohibiting understanding and buzzwords. Plan formatting, grammar, maps and explanations should be improved.

#### Leith Central Community Council (0614)

Comment that there is a repeated sentence at paragraph 2.141. Consider the Spatial Strategy - Map 2 hard to read. Notes that maps on p17, p19 and p21 are not clearly identified/labelled on the online version and comments they are hard to read.

#### NatureScot (0528)

Map 6 and on-line maps do not show the city's green blue network and as currently shown consider it difficult for individual proposals to "protect, enhance and link to" as information on the city-wide network is not available.

#### New Town and Broughton Community Council (0254)

Proposals maps are complex and detailed and ability to access via consultation hub difficult.

#### Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

To ensure that the local development plan fully incorporates the overall principles of "Creating Places" and "Designing Streets" the Plan should make reference that the Place Briefs, to be prepared, will incorporate the detailed design considerations as set out in "Designing Streets".

#### Southside Community Council (0781)

The Plan is too long and uses too much text and is not in line with planning reforms in 2006 and 2009 which aimed to create shorter more user-friendly Local Development Plan documents.

## **Introduction**

### Cockburn Association (0777)

Supports many areas of City Plan 2030, however climate impact and preparedness, Covid and post-Covid resilience and Brexit are insufficiently considered. Revisions should be made to the Plan to account for these factors. Plan needs to be applicable towards the end of its lifespan.

Supports 20-minute neighbourhoods, however more detail on what this will mean in practice and how it will be delivered is necessary.

### Dr Jane Gear (0487)

Introductory section is incomplete and requires paragraphs specifically to explain what measures exist to protect or enhance mental and physical wellbeing of current residents. No mention which directly supports the use of the term mental wellbeing or protection from the impact of negative change. Limited guidelines about architectural policies and aesthetics, but nothing about protection of existing qualities of properties which support the psychological and emotional needs of wellbeing. Consider the Plan includes development which would indubitably impact negatively by increasing stress by taking away or diminishing existing amenities.

### Elspeth Wills (0293)

Considers being a good place to live should have greater priority and that comments to Choices of the Grassmarket Residents' Association have not been addressed by City Plan.

Supports City Plan but consider it does not include measures to improve the lives of residents of the Old Town. Concerned about the commercialisation of public space in the Old Town, the conversion of housing to short-term lets in the city centre, and negative consequences on the area. Upset about the loss of public transport. Considers policies need to be applied more strictly. Considers there has been no action by the Council to prevent over tourism, and City Plan does not change this.

### Grange/Prestonfield Community Council (0192)

Consider that the Plan repeats aims of the current LDP and that these have not been achieved in part due to external factors. Considers that the introduction should state that an early review of City Plan will consider and learn lessons from previous LDP policies. Period of plan should be stated throughout the document.

Support the aims set out on p8 and strategy on p9 and p10. Notes that some strategies referred to are not finalised and that there will be a need to ensure continued alignment with approved strategies.

### Gilmerton & Inch Community Council (0716)

In favour of introduction but is concerned that it is unclear what many statements mean. Paragraph 1.5 and 1.6 are not being reflected in the Gilmerton & Inch area currently, and are similar to those in the 2016 LDP. There needs to be more detail provided about the statements in the plan, and all parties must be held accountable for making it work.

#### Hallam Land Management (0615)

Objects to City Plan as quality of life is predicated on economic growth and competitiveness, and a balanced approach to sustainable development is not taken, which is statutory requirement. Paragraph 1.2 is confusing and contradictory.

Sections of the community will not agree that the Plan will promote a city that is 'fair', particularly strategic house developers, hotel developers, tourist accommodation operators and taxi drivers. The Plan should recognise the importance of private housing and its economic and social benefits.

A net zero carbon city by 2030 is laudable but has costs. The Plan should not prevent new development. Parts of the goals of the vision are outwith the control of planning legislation and regulation.

Choices 12 has been unduly amended without due consideration of alternatives. There is insufficient evidence to justify City Plan 2030, and as such cannot accept it as the settled view of the Council. Procedural irregularities need to be tested at Examination. These irregularities refer to SEA / Environmental Assessments, Integrated Assessment and Socio- Economic Assessment of the proposed 'brownfield first' strategy. There has not been a Risk Assessment and the implications for Economic Impact have not been analysed. Costs associated with the strategy are not accounted for or integrated in the Action Plan. Concerned that CEC underestimates housing, economic development and infrastructure pressures, that City Plan 2030 will not attract necessary investment, and that many non-place policies are restrictive, constraining potential sites such as Craigiehall. Need to consider importance of range of tenures.

#### Julie Robertson (0210)

The reasons for poverty need to be addressed as well as emphasising it's importance. The Plan should emphasise training for people who can work but don't and training for people to enable them to do more productive jobs. People who can work should be able to work nearby to where they live. Worried about high density living and noise amenity impacts of living in apartment blocks.

#### Juniper Green & Baberton Mains Community Council (0306)

Concerned there is a lack of consideration of existing infrastructure and how new developments will integrate. Unable to develop a clear idea of Edinburgh in 2030 is the city plan is formed, as the Plan references other documents without providing links to them. Plan only refers to new development, ignoring existing development. Problematic where old buildings will require retrofitting to achieve the "sustainable and net zero city" goal. Too many qualifying statements are attached to categorical statements.

#### Leith Harbour and Newhaven Community Council (0776)

Supports introduction subject to changes being made.

Leith Links Community Council (0617)

The Plan should show it is cognisant of the impact of the pandemic, which has changed working patterns, the relationship between people and places, and our understanding of 'the local', changes to the local and national economy towards a focus on wellbeing away from measurement by GDP, community wealth building, local governance review, flexibility and responsiveness.

Supports plans ambition, but unrealistic ambitions present risks to credibility. Without detail of how plan will result in net zero emissions by 2030, including annual progress milestones, the ambition will have to be met by carbon offsetting measures which are not explained. Eliminating poverty by 2030 is misleading as poverty is caused by factors out with the control of Council.

Barriers to meeting ambitions understated. A public interest test should be implemented Compulsory Purchase Orders and rigorous monitoring of private developer commitments is required.

Affordable housing objectives cannot be delivered by the private sector, and Local Place Plans require additional consideration in the plan. At Seafield the Plan indicates that local communities will be consulted on the Place Brief but this is inadequate and insufficient, local communities have been working for two years on a masterplan. The four community councils instead should benefit from additional opportunities beyond standard consultation to shape the area, as described in NPF4.

Concerned that current areas of mixed use, will be replaced with 'housing-led mixed use' which is code for extremely dense housing with a few small, unsuitable, and unaffordable units. Concerned that Leith will change into a dormitory commuter corridor, and worried about where existing businesses will relocate to.

Para 1.4. is laudable, but unrealistic and misleading. There are in many cases no indication of how these aims will be delivered. It is unclear where the money to pay for the aims will come from. Developer contributions are unlikely to be sufficient. Council needs to intervene substantially in the market to achieve City Plan's goals, and there is no mention of this.

Para 1.5 The word communities is missing. Houses are not homes unless they are in a community, and locations and neighbourhoods are not communities without proactive efforts Communities consist of many different uses. Concerned about silo thinking in the Plan

Regarding Paras 1.5, 1.6 and 1.7 there needs to be evidence of greater commitment to community consultation and coproduction.

Mactaggart & Mickel Homes Ltd (0312)

Ensuring a sufficient range of new homes of all tenures is an essential challenge which must be met. Request that the role of the private sector in the economic success of the city is recognised within the introduction.

#### Melford Developments Ltd (0308)

Objects as City Plan is unambitious, will not create a more sustainable or prosperous city, contains many unnecessary policies that create barriers and difficulties for developers, will further complicate a depleted planning service, and will make development management decisions more difficult, costly and lengthier. The economic value of the construction industry in the city is underestimated and City Plan will have negative consequences for it.

#### Mr T Klan (0307)

Section should emphasise housing and employment provision to allow economic growth and resilience. Introduction does not reflect the Plan approach which lacks vision and does not reflect the importance of market housing and land development for economic development and social goals. Concerned that the Council underestimates housing and economic development pressures in the city, and with City Plan will not attract sufficient investment whilst being too restrictive regarding development on greenfield sites. City Plan contains many unworkable policies that are regressive and belong in guidance.

#### SEPA (0012)

Support introduction, approach to net zero and integration with other strategies. Suggest that the plan's 'regenerative approach' should be made implicit in opening paragraphs. Refers to December 2020 update to Scotland's 2018 -2032 Climate Change Plan and consider this sets the framework for achieving net zero and adapting to climate change through the plan.

#### Sergey Gorobets (0414)

Consider Low Emission Zone to be waste of time. Questions why 20,000 homes are being built in in Edinburgh if the space is very limited, contrary to other areas. Seeks definition of affordable and low cost housing. Considers places of value are not protected. Considers that if Edinburgh cannot grow the growth should be moved to other locations. Plan is too large, with too many non-specific proposals. Too many buzzwords. Development in the green belt, should be prevented. Consider policy which does not take carbon footprint of manufacturing and recycling into account is a political gesture. Questions why the Plan is expanding Edinburgh rather than addressing existing city.

#### Southside Community Council (0781)

Concerned that whilst addressing poverty and inequality is a key aim, that is inadequately addressed despite affordable housing provision and access to greenspace policies.

#### Tarmac (0244)

Objects to City Plan as quality of life is predicated on economic growth and competitiveness, and a balanced approach to sustainable development is not taken which is statutory requirement. Paragraph 1.2 is confusing and contradictory.

Sections of the community will not agree that the Plan will promote a city that is 'fair', particularly strategic house developers, hotel developers, tourist accommodation operators and taxi drivers. The Plan should recognise the importance of private housing and its economic and social benefits.

A Net Zero carbon city by 2030 is laudable but has costs. The Plan should not prevent new development. Parts of the goals of the vision are outwith the control of planning legislation and regulation.

The overall aims and objectives of the Plan should not suppress the supply of market and affordable housing or the need for high quality employment locations. Some of the issues raised as part of the vision related to the alleviation of poverty and access to employment are outwith the control of planning and reliant on other primary legislation.

The Friends of Midmar Paddock, Edinburgh (0121)

Broadly supportive of City Plan. The Plan should indicate where development should not happen. Cannot find reference to Braid Hills in the Plan. Notes that developers have bought land in the Braids area, indicating developers believe that green belt status is insufficient to prevent development there.

Thomas Tierney (0400)

Vague proposals and no up to date costing of proposed projects. Proposal is out of date and overtaken by the effects of the pandemic on industry and travel patterns.

Scottish Wildlife Trust Lothian Group (0560), Dr Tim Duffy (0503)

Suggest Council's Climate and Biodiversity Emergency declarations are included in the introduction.

University of Edinburgh (0464)

Support ambition for a sustainable city, that improves health and wellbeing by encouraging. Active Travel and reducing unnecessary car travel, aligning with the University's own strategy and partner objectives. The Plan must be flexible, reflecting current needs while accounting for viability and deliverability. Supports the greenbelt, however, site specific factors and assessment need to reflect changing circumstances. Supports carbon neutral building aims. Sustainability is more than this however. Supports the promotion of health and wellbeing, including access to green space, improving of biodiversity and active travel; 20 Minute Neighbourhoods; Active Travel Routes and public transport and active travel network safeguards. Given the pace of change and reflecting the proposed 10 year lifespan of the plan, it is impossible to capture all eventualities in terms of future needs of the University. It is therefore critical that the content of the Plan is viewed with a need for flexibility, and to allow review of approaches where appropriate to reflect current needs whilst balancing viability and deliverability pressures.

William Moyes (0305)

Overall the Plan is not a good document. Maps very hard to follow, few specific KPIs, many of the Council's will require the cooperation of others. No clear identification of the role other agencies such as NHS will play in delivering plan. Cost to the Council of the plan's many proposals and source and availability of funds are barely mentioned. There is no risk analysis. There is no assessment of the impact of the Covid-19 pandemic. Not confident that much of the Plan will be delivered.

Wright PDL (0078)

Economic and social benefits of house building need to be restated.

**Aims**

Andrew Anderson (0535)

Considers plan objectives are not realistic, plan does not give enough detail of how they will be achieved and what the measurable targets are around net zero, poverty and 20-minute neighbourhoods.

Anna Brand (0742)

Considers net zero targets are not enough if they rely on offsets to compensate for high emissions elsewhere.

Andy Inglis (0138)

Edinburgh doesn't need to grow. Considers Edinburgh should aim to have as good active travel and public transport infrastructure as Paris and aim 1 should be more ambitious than providing "better" active travel infrastructure.

Archie Clark (0003)

Agrees with aims but notes the mobility difficulties of some communities of people.

Arnold Myers (0758), Jennifer Hess (0771)

Plan should prioritise preservation of open space over development

AREAA (0358)

Supports aim 1 and 4. Supports aim 2, however urges that where greenfield development within the city would meet an identified need, while meeting other objectives it should be considered. Supports aims 5 and 8, however this is qualified by reference to detailed comments elsewhere.

Bo Adams (0363)

Considers plan not bold enough and all new developments need to have shops, restaurants, schools GPs, small shops.

Brian Tiplady (0641)

Supports 20-minute neighbourhoods but public transport network should also be prioritised

CBRE Global Investors (0644), Nuveen Real Estate (0564), Nuveen Real Estate (0734)

Suggest amendment to aim 10 to better reflect the key role that commercial centres play within the wider retail hierarchy, and their varied and interchangeable nature.

Cramond & Barnton Community Council (0243)

Concerned about loss of small scale industrial & commercial sites as this impacts on business and conflicts with the 20-minute neighbourhoods' strategy. Whilst a brownfield first approach is appropriate where sites are unoccupied, removing occupied sites would be contrary to 20-minute neighbourhoods and economic policies.

Concerned that the definition of a 20-minute neighbourhood does not provide a list of amenities to be provided within it, or what a key community facility is. The difficulties of providing these amenities within existing neighbourhoods have been underestimated.

Douglas Tharby (0148)

Questions why if 'Infrastructure is first' is it listed as aim 8 and aim 9 and suggests reordering.

Dr David Houston (0655)

Considers aims are not achievable without a larger financial budget. The aims should be more realistic given the financial constraints and focus on redevelopment rather than substantial new growth.

Edinburgh Chamber of Commerce (0379)

Support 20 minute neighbourhood agenda in local residential areas but city centre businesses must also be protected. It is not yet clear that the new housing sites allocated will be more easily accessible by public transport/active travel options than other non-allocated sites. Several of the new sites allocated for residential development have been put forward by the Council, but it is unclear what the view of the respective landlords are and what consultation has been done with them before selecting these sites. Allocating these sites risks compromising the business plans they may be in place which seems at odds with the overarching economic ambitions stated in this section. The level of displacement of businesses that currently occupy the newly allocated sites may lead to an increase in car dependency for some. Welcome specific reference to the retail core of the City Centre and the recognition it makes to the economic and cultural life of the city and wider region. However, economic factors will be impacted by the restriction of available homes, thereby restricting the available workforce.

Suggest that at Aim 1 the 20 minute neighbourhood policy should be more nuanced to also protect city centre businesses.

Edinburgh Napier University (0731)

Supports 20-minute neighbourhoods, however the wording used is not inclusive and should refer to walking, wheeling and cycling, alongside retaining the reference to active travel and public transport.

Edinburgh World Heritage (0339)

Consider that the World Heritage Site and historic environment generally are vitally important to Edinburgh and carefully integrated policies and proactive action is required to maintain and protect it therefore the conservation and enhancement of the historic environment must be a key aim of the plan. Should reflect that embodied carbon is of high



importance to net-zero alongside operational emissions. Note the contribution that the historic environment makes to drivers and outcomes of plan. The city also needs to respond effectively to what is an unprecedented period of change from national retail trends, to working patterns and risk of building vacancy, to the impact of tourism, to the impacts of Covid-19 and climate change. Ensuring that heritage is protected and at the heart of decision-making will be vital for Edinburgh's success.

Frances Guy (0589)

Emphasis should be on all city dwellers having access to all services, including culture, sport and the amenities of the historical centre. Should elaborate on what services will be offered within the 20-minute walk.

Considers plan is not ambitious enough to meet zero carbon emissions target. At aim 4 recognition is needed of the need to also retrofit all housing stock in order to cut heating costs and carbon emissions from heating poor quality infrastructure, noting that this is one of the biggest sources of emissions.

Graeme Parry (0230)

Supports strategies to make Edinburgh greener, cleaner and sustainable city, the preservation of green spaces for recreational use, strategies to encourage active travel and improve public transport, and the reduction of car use in the city. Supports protection of green spaces and places for people. Pleased to see plan refers to impacts of development on local infrastructure but believe this needs more thought.

Hallam Land Management (0615), Tarmac (0244)

There is no evidence or detailed justification for important parts of the strategy such as how sustainable 20-minute neighbourhoods will or can be retrofitted into the spatial strategy or how major strategic and economic designations relate.

The aims of the Plan are described in very general terms, and it is not obvious where these are derived from in terms of available evidence. The objectives, whilst reasonable, do not offer developers clear guidance on what will be expected in planning submissions. Objectives are laudable in themselves it is not clear that they have a locus in the formulation of planning decisions under the Act or the Local Development Plan Regulations. Plan is in danger of being submersed in unworkable policies that are largely regressive and belong in guidance rather than the LDP itself.

Jay Chimo (0674)

Should improve liveability rather than promoting growth.

John Bremner (0140)

The city does not need to grow, it is already at the limit and traffic congestion is the result. As the traffic cannot be improved since the roads cannot get wider, development into the greenbelt must stop as it solves nothing but instead destroys the beautiful city as it is now. Considers LEZ is pointless as the number of non-compliant cars is going down fast naturally.

Juniper Green and Baberton Mains Community Council (0306)

Support aims in general but consider some need to be given more concrete form.

Leith Harbour and Newhaven Community Council (0776)

Supports aims in principle but is concerned that high quality/high density is not synonymous with creating intergenerational sustainable communities essential for 20-minute walkable neighbourhoods and may exclude the vulnerable, elderly and disabled.

Aim 2 is essential in Edinburgh Waterfront (EW 1a) Central Leith Waterfront area.

Requests clarification regarding approval of legislation for the implementation of Local Place Plans. Policies should be included to ensure heating and energy infrastructure is non-gas for all new developments well before 2030 to achieve net zero before this date.

Flooding reduction to be achieved by the minimisation of hardstanding and preventing the use of astro turf.

Lynn Grattage (0362)

Suggests change to aim 2 to "Directing new development to brownfield sites, and some greenfield sites within the city boundary, currently used for agriculture, with the proviso that large parks are provided in areas where fields existed, to allow access to nature, and ensure good air quality can be maintained."

Melford Developments Ltd (0308)

Objects to the aims as they are nebulous, rhetorical and pointless. Development is sacrificed in favour of environmental and energy objectives.

Michael Ramsay (0011)

Support the strategy as the Plan allows for development and growth in appropriate locations. Suggests that the target should be net zero for the city in the future while maintaining its character and heritage.

Murray Estates (0197), Stewart Milne Homes (0118)

Objects to City Plan 2030's strategy and specifically Aim 10 to reallocate active business/industrial sites and allocated employment land to housing use. Object to reallocation of IBG and Bioquarter. Consider the Plan is radical, and its consequences have not been considered. There is no explanation of the strategy and outcomes sections, making City Plan 2030 misleading.

Nicola McCowan Hill (0195)

Support the aims of the plan, but the strategy proposed is insufficient to deliver on them.

Patricia Willder (0205)

Development has reduced the available greenspace in Edinburgh reducing residential amenity and creating more dense communities that are not good for resident health and wellbeing, biodiversity, woodland and trees, and flood risk.

Robert Falcon (0640)

Supports infrastructure first approach however several aspects of the Plan propose developments in areas where infrastructure is missing or inadequate, which suggests this principle is being ignored in some part. Aim 10 should not include West Edinburgh development which is building on greenfield sites. Existing land is available and provided with services at the Gyle and Edinburgh Park, and there is no evidence to suggest need for further office or distribution developments - especially given the very large amount of empty office space that exists post-pandemic. Prior to any West Edinburgh site approvals being given existing capacity should be used. Developers will always build first on greenfield sites, so allowing this will effectively leave better connected and currently blighted brownfield sites undeveloped.

RSPB Scotland (0648)

Welcome the recognition of the twin nature and climate emergencies in the Plan and the inclusion of policies and text throughout which weave nature, biodiversity, climate adaptation and resilience and nature. Concerned about aim to direct development to brownfield as many sites support biodiversity.

Sarah Adamson (0523)

Considers use of brownfield sites is short-sighted in that these areas are often those with greatest biodiversity value. On the other hand green areas are often of mown grass and particularly used by dog walkers thus making these green areas less desirable to our native predators and visitors reliant on invertebrates for their survival. The sites are probably of lower biodiversity value. Disused brownfield sites are good for wildlife. Formal parks often have mown grass which are not good for wildlife. Considers grand statements in the introduction are empty rhetoric.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Suggest consideration of a stronger planning policy position in relation to vacant and derelict land and buildings in line with policy as proposed in draft NPF4.

Shortbread House (0619)

Comments that areas identified as employment centres would appear to be minimal in relation to the amount of residential areas and asks if this means that people living in the city of Edinburgh will mostly be expected to travel to work out with Edinburgh. Support aim 2 however consider that jobs will be lost where areas are redeveloped. Allocation of active employment sites to meet housing requirements is an unsustainable approach as workers will need to travel long distances.

National outcomes do not mention providing a meaningful number of jobs within the city as being part of the national context. It is essential for local jobs and employment in all sectors to also be at the heart of development.

Do not consider that City Plan has a key role in helping to deliver economic strategy. By removing a whole area of local light industrial activity in Leith by developing it for housing, it removes both job opportunities and a healthy hub of activity which is an important focus for people living in the area.

#### Southside Community Council (0781)

Supports City Plan's focus on climate change and prioritising brownfield land for development. However, the prioritisation of brownfield land could be emphasised more strongly. Supports 20 minute neighbourhoods, but it is not clear how these will be implemented. Guidance will be needed on how to submit proposals that meet this aim. Supports the 35% affordable housing contribution. The strategic objectives need to be expressed in City Plan 2030 and planning decisions at the site level to match.

#### Homes for Scotland (0404), Steve Loomes (0767)

Considers there are contradictions in the Plan. The Council is committed to building 20,000 affordable and low-cost homes over the next 10 years versus proposing a brownfield only approach to housing land release that will have a major detrimental effect on the steady annual delivery of the much-needed homes. The need to support business versus the high percentage of new housing sites allocated on existing active business land. Density requirements versus amenity/placemaking/open space/family housing requirements. Considers that the statutory context that this Plan is to be prepared under is NPF3. Surprised that there has been just a 6-week consultation period and that the supporting evidence to justify the Council's strategy has been so limited.

#### The Royal London Mutual Insurance Society Ltd (0149)

Objects to aims 2 and 10. City Plan will involve the displacement of employment (particularly industrial) to accommodate residential development, but there are no coherent plans for relocation of employment uses. Evidence to support City Plan is insufficient and it is not justified. The Plan is misleading and needs to make greater provision for business and industry. Land allocated for housing includes land in active employment use, including Royal London's land holding at Seafeld Way. Objects to Place 15, as provision is not made to support the continued employment use. Plan is not informed by sufficient evidence. The Edinburgh Commercial Needs Study: Mixed Use Delivery (ECNS)(December 2020) has not informed City Plan 2030, as it is not identified as a background report, but has been referred by previous consultations.

The representation argues that as a consequence of City Plan 30% of Edinburgh's industrial stock will be reallocated to other uses, and large numbers of jobs and businesses will be lost, therefore the plan's aims and policies should be revised to support business and employment land within the urban area.

#### **National Strategies**

##### Andy Inglis (0138)

City Plan does not consider animals enough and will fail because of this. Refers to 2017-2027 Pollinator Strategy. Increased wellbeing for humans should not be only metric.

##### Archie Clark (0003)

Requests clarification on para. 2.19, if the words "Rural Development" refer to building in the countryside, or to ensuring that there is an adequate domestic food supply available for the population. Agrees with water management conceptually and hopes this can be

delivered through local water features, but feels the Plan is unclear about how water management will be delivered.

Cockburn Association (0777)

Radical changes are needed to land-use policy to meet net-zero targets. There should be examination and explanation of how the Plan meets net zero targets.

City Plan's impacts on wellbeing are not substantiated and it is unclear how public health will be framed, with 20-minute neighbourhoods being given as the mechanism. More clarity and in-depth information should be specified.

Edinburgh World Heritage (0339)

Should include reference to relevant historic environment protection legislation, policies and strategies.

Grange/Prestonfield Community Council (0192)

As some strategies are not yet finalised it is not possible to comment on how City Plan will work with them. It is up to Council to ensure that plan continues to align with other approved strategies.

Hallam Land Management (0615), Tarmac (0244)

Consider that the Plan will not be able to properly integrate NPF4 changes and regional spatial strategies and these matters have not been properly consulted on. Plan has been prepared in the context of SPP and needs to reflect that document as well as the fact that there is no strategic guidance in the form of an approved or up to date SDP. This is not competent in terms of the Development Planning Regulations, nor will it prevent the LDP from becoming out of date almost immediately. Interim Regional Spatial Strategy and City Deal cannot be accepted as a substitute for effective regional guidance and targets. Transport assessments cannot be considered as legitimate guidance that have been consulted upon as part of this LDP process, which is therefore deficient.

Edinburgh and local planning policy drivers repeats previous statements and are general statements of intent derived from other research or policy documents. Plan has not been subject to Economic Health or Housing Impact analyses that would be expected. At present the success of the key drivers more related to conjecture than evidence, almost exclusively reliant on the untested 20-minute place-based approach. There is a need to recognise the objective to take communities, landowners and developers with the Council on this journey towards climate resilience. In particular the scope for social housing targets will not be achieved without co-operation and related funding as well as a compromise in terms of policy flexibility.

Brownfield strategy will remove mixed uses and employment in urban areas dispersing these to the suburbs and increasing commuting trips. There is no assessment of how 20-minute neighbourhoods will be integrated into the urban area. The Plan writes off employment land in favour of housing and related commercial uses without any justification, evidence or real consultation. This is contrary to the emerging NPF4 and the strategy for West Edinburgh presented at Choices, which now appears to be severely diluted.

Leith Harbour and Newhaven Community Council (0776)

Support City Plan 2030 in principle, subject to changes listed.

Leith Links Community Council (0617)

Paragraph 2.11 seems to be a pre-pandemic perspective. Extra support will be needed by the hospitality industry, changes in universities mean less need for student accommodation, tourism will be rethought and made less intensive, more localised and more sustainable. Edinburgh Airport may be shrinking in importance and rail services need to be reconsidered and prioritised.

Think that the overall design concept in Edinburgh currently is low quality. Sceptical about the city's plans and capacity to deliver. Particular concern with development in the North East area and consider heritage of the area is being damaged. New and planned buildings are too tall, featureless, over dense, internal apartments are too small. City Plan should be taking the lead, drawing up a blueprint, and should set the bar much higher in terms of design standards.

Sceptical about the city's plans and capacity to deliver on ending poverty.

Melford Developments Ltd (0308)

Objects to this section of the Plan as do not consider that it is well aligned with The Planning Act, Scottish Planning Policy or economic development strategies for the ending poverty and wellbeing & equalities do not represent what is expected from a LDP nor that these are the appropriate drivers. Contrary to national policy guidance insufficient land has been identified to meet development requirements in full.

NHS Lothian (0596)

Supportive of the reference to wellbeing and Inequalities at paragraph 2.35 and would welcome the introduction of a new paragraph that makes reference to key health and care strategies for the city, including the Lothian Strategic Development Framework and the Edinburgh Integration Joint Board Strategic Plan.

Robyn Kane (0091)

Aware that the council took part in the poverty commission however nothing has been done on the ground to actually fix things.

Roger Thomas (0345)

Consider aviation to be unsustainable and incompatible with the green ambitions of the Council and will remain so for the foreseeable future.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

No changes required, however, the Council should consider the recently published draft NPF4, and the emerging position in relation to national developments. The publication of draft NPF4 signals a shift in the national policy direction over national developments. Of

particular relevance are proposed national developments for Edinburgh Waterfront; Urban Sustainable, Blue and Green Drainage Solutions; and National Walking, Cycling and Wheeling Network; in addition to the Central Scotland Green Network. Draft NPF4 does not propose to continue the national development designation for Strategic Airport Enhancements. When the national developments are finalised as part of adopted NPF4, they will interact with what is in the Environmental Proposals (Table 1), Active Travel Strategic Projects and Safeguards (Table 3), as well as policies and proposals for Edinburgh Waterfront and North East Edinburgh as set out in the proposed plan.

Stronger links to the marine planning framework should be made given the extent of coastal development proposed in the plan. Should include reference to Scottish Government's Heat in Buildings Strategy, and the Heat Network delivery targets in section 92 of the Heat Networks (Scotland) Act 2021. Suggest that whilst no regional marine plan has been published to date it would be prudent for plan to reference the need for alignment with any future regional marine plan, either in the 'Regional context and change' section or in any of the subsequent policy chapters. Should reference the City Region Deal for Edinburgh and South East Scotland and highlight any spatial implications or consequences arising from this.

#### SEPA (0012)

Suggest inclusion of Climate Change Strategy and Water Vision. Refers to December 2020 update to Scotland's 2018 -2032 Climate Change Plan and consider this sets the framework for achieving net zero and adapting to climate change through the plan. Consider outcome for economic success to be linked to mobility.

#### Southside Community Council (0781)

Clarification of how plan policies will interface with NPF4 is necessary. Notes that City Plan 2030 must be integrated with other Council plans and strategies, such as the City Mobility Plan.

### **Outcomes – General**

#### Cramond & Barnton Community Council (0243)

Suggest that outcomes should give greater emphasis to climate change, climate change adaption and mitigation, and reflect the natural and built heritage conservation aspirations of residents.

#### Grange/Prestonfield Community Council (0192)

Support outcomes but suggests replacing phrase 'we want Edinburgh to be' with a to state what the LDP can do. Suggest strengthening of para 2,58 to ensure green belt land does not become degraded and improve access. Development in green belt should be resisted. Considers much of Edinburgh will be untouched by city plan as most of the infrastructure and built environment for the period is already provided.

### **A sustainable city which supports everyone's physical and mental wellbeing**

#### Alexander Sutherland (0193)

Supports the aim of Edinburgh becoming a sustainable and net zero city, particularly paragraph 2.28.

Andrew Heald (0566)

Should have specific reference to i-tree survey and Edinburgh's Trees in the City Action Plan 2014.

Archie Clark (0003)

Agrees with paragraph 2.39. and wishes to know if amenity benefits of 20 Minute Neighbourhoods will apply to existing communities. Notes paragraph 2.43. Requests clarification about extent of Council support to communities when communities design place briefs. Concerned allocation of Land at Land East of Millburn Tower will create precedent for green belt development beyond outer City Bypass. Notes that development in flood risk areas is not prohibited by City Plan 2030. Worried about flood risk as this will increase over time because of sea level rise. Requests clarification about the timescales that City Plan covers, and the timescales of increases in Council resourcing to manage increasing flood risk.

Disagrees with LEZ proposals in paragraph 2.84 as technological progress will resolve the issue. The LEZ proposals will cause drivers to shop outside of the city centre which is not sustainable, will result in people parking far away from where they live.

Requests clarification on the quantity of emissions resulting from the LEZ along Lanark Road at Gillespie Crossroads, the centre of Juniper Green, Blinkbonny Road/Lanark Road West and any narrowed parts of the road. Wishes to know how 20 minute neighbourhoods will be delivered in Balerno, Currie and Juniper Green.

Disagrees with maximum parking limits as they will result in increased illegal parking in areas where people need to drive.

Cockburn Association (0777)

Generally welcome proposed outcomes outlined in City Plan. However, in many sections, there is no clear statement of outcome which undermines the usefulness of this section and weakens a focused delivery of the plan. Welcomes the commitment to no new green belt releases in plan period but has concerns with some of the land removed from countryside policy where it pursues development proposals on the western approach corridors. In terms of meeting its net-zero carbon strategy, the loss of any green space should be avoided, and the policy commitment to protecting countryside land needs to be strengthened.

Supports the wider ambitions to develop and reinforce the blue-green network across the city and suggest a new policy advocating protection of private green spaces such as the large, treed gardens in the inner suburbs should be established, enhancing existing policies.

Cramond & Barnton Community Council (0243)



Considers there should be greater emphasis on climate change adaption and mitigation and on the conservation and positive management of the city's unique built and natural heritage.

Strongly supports continued green belt designation shown on map 5, p.21 of land at Cammo, and land including the former Craigiehall MoD Estate.

Edinburgh World Heritage (0339)

Should reflect the wider contribution the historic environment makes to social, environmental and economic health. To protect heritage and the many benefits it brings, it will in some cases be necessary to not apply or apply new requirements in a bespoke manner, particularly within the Old and New Towns World Heritage Site and this must be supported in policy wording. It does not imply stopping change but considering appropriate application and tailored approaches to positively manage change. Suggest an additional bullet to paragraph 2.62.

Considers plan should heavily promote the reuse of historic buildings and highlight the benefits of their embodied carbon. Critical to ensure alignment of priorities between the City Plan 2030, the future World Heritage Site Management Plan, and the draft 2030 Climate Strategy and its subsequent policies.

Grange/Prestonfield Community Council (0192)

Support detailed statements on outcome for Edinburgh to be a sustainable city which supports everyone's physical and mental wellbeing, except for green belt as consider it has failed to prevent development and large scale agricultural, sports and leisure developments should be resisted. Development in green belt should be resisted.

Homes for Scotland (0404), Steve Loomes (0767)

Considers policies on brownfield only and high-density requirements to be restrictive and will make aims of plan difficult to achieve. A balanced approach to design/density is required. Should not be blanket requirement for 65 dwellings per hectare.

Concerned that design and place policies align with the conservation area character appraisals. Questions how the twin ideals of delivering 20-minute neighbourhoods and respecting the existing character of these areas can be met. Comments that existing urban fabrics will need to be re-shaped to meet the 20-minute neighbourhood requirements.

Consider that the green belt boundary and policy is extremely restrictive and will mean growth requirements will not be met.

High-density strategy will leave little or no opportunity for quality and effective green infrastructure. Many of the newly allocated brownfield sites are within central/urban areas, near to business/industrial uses, and will experience significant noise impacts.

John Torrance Glencross (0509), Oliver Glencross (0489)

Supports strategy and aims but requests more open greenspace in Cramond.

Juniper Green & Baberton Mains Community Council (0306)

Agrees with section 2.39. requires gaps in provision of amenity to be developed and how these will be resolved identified.

Agrees with masterplans being produced as per paragraphs 2.43 and 2.44, but the Council should create these. Further information about Place Briefs and how they will facilitate early stakeholder engagement should be provided.

Concerned that if Land East of Millburn Tower is granted planning permission this will encourage further greenbelt development. The Council should contain development to the existing city footprint.

Requests clarification about emissions created along Lanark Road at Gillespie Crossroads, the centre of Juniper Green, Blinkbonny Road/Lanark Road West and other parts of the A70 where schoolchildren walk to and from school, and at narrowed parts of the road - e.g. Bridge Road/Lanark Road West in Balerno.

Leith Central Community Council (0614)

Questions if a Strategic Flood Risk Assessment has been undertaken. Should include reference to industrial built heritage.

Leith Harbour and Newhaven Community Council (0776)

Supports this section in principle, on condition that changes are made. Suggests strengthening of wording. Consider section is biased towards World Heritage Site and other areas of the city should be named. Should restore rather than demolish buildings. Considers that paragraphs 2.68 - 2.70 contradicts paragraph 3.130.

Liz Glass (0645)

Support one million tree strategy however native species should be prioritised to prevent spread of disease.

Mark Ockendon (0419)

Notes the omission of the sky and considers one of Edinburgh's endearing features to be a lack of high-rise buildings, and ability to see much of the sky even from within the city and this should be explicitly added to plan and should be protected from overdevelopment.

Melford Developments Ltd (0308)

Objects to each of the outcomes as currently articulated. These need to be more precise and articulate a planning purpose together with proportionality and the ability to deliver. Sustainability is a legitimate outcome. Physical and mental well-being is not the responsibility of the planning system, although land use can contribute through environmental quality and urban design standards as well as heritage and culture. This outcome and its explanation is confused with the interests of Public Health Scotland. Good quality facilities and amenities need to be accessible but the Plan will disperse local employment sites businesses and mixed use areas increasing the number and length of trips.

Mr John G. Skinner (0065)

The new strategy for West Edinburgh, Waterfront, South East and Bioquarter in particular, will have an impact on the City's topography. Considers it would be helpful to decision makers to have a computer generated image of their effect on the existing relationship with the City's natural features and its high rise strategy.

NatureScot (0528)

Consider that plan underplays scale and impact of coastal change. Support protection of green belt however should acknowledge that developing green belt has opportunities for climate resilience and nature enhancement. More explicit links with active travel routes, proposals and safeguards would more effectively deliver 20 minute neighbourhoods and a city where you don't need a car to move around. Integrating active travel into the north and south orbital proposals would make modal shift, including changing mode during a trip, more feasible for most residents. Suggests Council needs a Coastal Adaptation Plan and City Plan should address issue of coastal change to a great extent across policies.

Consider that the state of nature and the role of natural capital in underpinning prosperity needs to be more fully and explicitly recognised. Welcome the overall plan objectives for compact city growth and the ambitions for the green blue network however suggest that further work is needed to ensure that there is a clear and deliverable approach to addressing these aims. Should be considered as integral part of infrastructure first approach. Should include relevant on and off site requirements to be identified for allocated sites. Welcome the use of Dynamic Coast but note that the project is led by Scottish Government, managed by NatureScot and research carried out by Glasgow University. Generally welcome the proposals for the North and South Orbital and consider that these proposals should link with active travel routes.

Refers to draft NPF4 which establishes a broader purpose for green belts in future. Consider that this broader purpose aligns well with the aims and objectives of the Proposed Plan and it would be relevant to include at paragraph 2.58. Suggest that in support of Policy Env 6 Green Blue infrastructure, the Plan should include information on the existing green blue network and opportunities for delivery of green blue infrastructure in development to contribute to enhancement of the wider network.

NHS Lothian (0596)

Encourage flexible policy approach to the provision of community services and emphasise the importance of collaboration and partnership across the public, private and third sector, as well as with communities. Would welcome the opportunity to engage with the Council in seeking to develop walkable neighbourhoods, as well as the ability to engage with the CEC on their delivery of these communities, to ensure that the themes of the Lothian Strategic Development Framework are supported. Note that there are significant opportunities in the city for sharing energy, sustainable energy and transport infrastructure, which should be referenced within the concept of creating 20 minute neighbourhoods.

Ratho and District Community Council (0289)

Considers low carbon city at paragraph 2.29 to be over ambitious.

Roger Thomas (0345)

Considers that there should be a presumption in favour of natural sandstone and slate in order to preserve unique character of Edinburgh.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

State that paragraph 2.52 is factually incorrect and should read “In conservation areas, conservation area consent is required for demolition of buildings. Additionally planning consent may be required for some developments, such as window alterations to a house or flat, which elsewhere in the city would not generally require a specific grant of planning permission. This additional level of control helps to ensure that small scale incremental changes do not damage the character or appearance of the conservation areas. The Proposals Map and Appendix A show which parts of the city are covered by conservation areas.”

To signpost scheduled monument consent, where to source advice and to align with paragraph 145 of Scottish Planning Policy suggest insertion of text requiring scheduled monument consent and need to seek advice from Historic Environment Scotland.

SEPA (0012)

Consider that there is a direct relationship between a poor environment and poor physical and mental well-being and improvements to the environment have direct consequences on improved conditions for physical and mental well-being. Suggest inclusion of text to emphasise the importance of citizens’ hyperlocal’ environment.

Stirling Developments (0303)

As part of a 20 minute neighbourhood the Plan needs to ensure that new homes are delivered close to existing employment clusters. Furthermore, sustainable development should be supported where it can benefit economic aims.

The Association for the Protection of Rural Scotland (0334)

Support the aims and principle of 20 minute neighbourhoods but considers a clear definition is needed. Consider that use of 20 minutes may lead to a sense of disappointment for areas or groups of the population where the implied numerical target is missed, even if it leads to improvements in wellbeing and amenity. Strongly support retention of current green belt and suggest consideration of opportunities to enhance the protection of peri-urban countryside through green belt designation. Suggest that in addition to the planning purposes of the green belt the designated areas can also contribute to tackling the climate emergency, through storing carbon in soils and woods and contain significant areas of prime agricultural land, important for home-grown food production, and of semi-natural woodland, valuable for carbon storage and biodiversity. Recommend stronger protection for the green belt, including the presumption against development on its designation. Suggest care required to ensure that 2.67 does not undermine the aims of 2.65 and 2.66 as consider there is little space for Edinburgh to

expand, which is not already valuable designated green belt, countryside or blue/green network. Consider the need to monitor the health of the city's trees an omission.

University of Edinburgh (0464)

The approach to health and wellbeing should seek to encourage this to be a factor to be considered in the design of new facilities as well as considered from the perspective of wider health and wellbeing infrastructure. This should include healthcare infrastructure, active travel networks and access to open spaces and sport and recreational facilities. Physical and psychological wellbeing has also been linked to contact with biodiversity or nature. The sports and exercise facilities also provide a valuable resource for the wider community. It is recommended that the importance of health and wellbeing in design and the provision of facilities is strengthened in the context of the Plan. Support the promotion of 20 minute walkable neighbourhoods and consider that they can play an important role in realising the Council's ambition.

Wright PDL (0078)

Consider that the accompanying text contains numerous contradictions and issues. Paragraph 2.38 recognises the importance that land use planning must play in both climate change adaptation and delivering sustainable communities. However, this is clearly contrary to the extremely restrictive and unrealistic policies on brownfield only and high-density requirements. Paragraph 2.39 notes that the Plan aims to ensure that everyone has access to a range of amenities in their area through the promotion of 20-minute neighbourhoods. This ignores existing neighbourhoods that do not have the range of amenities required. Paragraph 2.42 states that new development, through its design and contribution to place-making, should enhance not detract from the city's overall character and quality of environment and should help mitigate against, and adapt to, the impacts of climate change. Agree entirely with this statement, but the restrictive policies in the Plan make these goals very difficult to achieve. A balanced approach to design is required, not an overly prescriptive one. Paragraph 2.87 notes that the Proposed Plan contains policies which protect amenity and ensure noise levels are acceptable for future and existing residents. There is a contradiction here, in that many of the newly allocated brownfield sites are within central/urban areas, near to business/industrial uses, and will undoubtedly experience significant noise impacts.

**A city which everyone lives in a home they can afford (includes housing land requirement and housing land supply)**

Archie Clark (0003)

Considers building houses on land previously used for factories is a bad idea because houses require supporting infrastructure, services, schools, and cause traffic problems as new and neighbouring residents must commute further where there is not a mix of uses in an area.

David McGowan (0168)

Considers it is wrong to compromise the wellbeing of established residents for the expansion of the city.

The Davidson's Mains and Silverknowes Association (0454)

Support the principle at 2.90 that new development will only be supported where it can be demonstrated there is infrastructure capacity to absorb the additional impact of the new development, but the application of the principle needs to be significantly strengthened.

Douglas Tharby (0148)

Consider the use of the term 'everyone lives in a home which they can afford' too nebulous. Term is meaningless as it cannot be quantified. Considers housing figures are at best only a guess.

Edinburgh World Heritage (0339)

Suggest page 26 could be enhanced by noting the reduction for demand in retail in some areas to re-introduce much-needed housing supply, also enhancing their historic character/use. Suggest paragraph 2.88 could be enhanced to reflect that drainage capacity will also be a key consideration.

Grange/Prestonfield Community Council (0192)

Support outcome for Edinburgh to become a city in which everyone lives in a home which they can afford except for para 2.92 as consider ensuring provision of truly affordable housing is outwith scope of LDP.

Homes for Scotland (0404), Steve Loomes (0767)

Brownfield only approach and high-density standards make aspiration for housing difficult to achieve. A range and choice of sites including greenfield release would create a much more effective balance in the delivery of the right product at the right time with the right amenities. Expect the Council to have assessed each new housing allocation on the basis of infrastructure capacity as part of its brownfield only approach. Cannot be assumed that higher density equates to better design, mix and place making. It is dependent on the surrounding built-up area and the housing mix requirements for that area. Higher density can also put more strain on the existing services.

Private sector has been and will continue to be, a major contributor to the delivery of essential affordable homes across the city therefore essential that the views of the home building sector, are properly considered. A brownfield only approach to new housing allocation is a threat to the fast, effective and value for money delivery that the affordable sector requires.

Kathryn Poolman (0574)

Support emphasis on brownfield development and would like action to repopulate the city centre and oppose short-term letting.

Nicola McCowan Hill (0195)

The Plan is not consistent with SPP. The Plan is inflexible with regards to the overarching strategy to focus solely on the allocation of additional brownfield land for residential development. The Plan does not support existing businesses.

NHS Lothian (0596)

Note that the aspiration for 37,000 new homes over the period of the City Plan 2030 will have a major impact on many aspects of health and social care planning. Consider this might be experienced as tipping points for some services and for larger developments, such as those in West Edinburgh, may mean that a more fundamental consideration of wider NHS strategic planning and masterplanning is required. Therefore, encourage the Council to establish a regular forum with NHS Lothian that focuses on housing proposals as they develop, as well as in relation to the creation of Place Briefs and their associated Development Principles.

Peter Allen (0336)

Agrees with paragraph 2.91 that design should be at the heart of new developments but would like to see more detail about how volume house builders will be compelled to use good design principles, and create amenity, given the current mono-cultural approach. Considers community-led collective custom build delivers better design than volume house building.

Roger Thomas (0345)

Should prevent housing loss by reducing number of short-term lets and include within 2.94.

Simon Thomson (0248)

Supports aims but notes that the commitment to build 20,000 affordable homes extends only to 2027, and that this number does not accord with the demand figure set out in the supporting housing paper. Considers that many of the proposed housing allocations are not deliverable to meet housing targets and the strategy should encompass suitable, sustainable greenfield sites in addition to brownfield land to assist with meeting the affordable housing demand in full.

Tessa Haring (0112)

Comments that people need affordable homes and considers that short-term lets have swamped the market in Edinburgh. Consider climate change to be an urgent issue and public transport should be improved.

Wright PDL (0078)

Brownfield only approach and high-density standards make aspiration for housing difficult to achieve. A range and choice of sites including greenfield release would create a much more effective balance in the delivery of the right product at the right time with the right amenities. Expect the Council to have assessed each new housing allocation on the basis of infrastructure capacity as part of its brownfield only approach.

The Plan is not consistent with SPP. The Plan is inflexible with regards to the overarching strategy to focus solely on the allocation of additional brownfield land for residential development. The Plan does not support existing businesses.

**A city where you don't need to own a car to move around (includes transport and infrastructure)**

David McGowan (0168)

Disagrees with transport provision in the city and the promotion of cycling. The city has many hills and an aging population. The Council has not considered people with disabilities or families with young children.

Douglas Tharby (0148)

Sections 2.115 to 2.118 assume that most journeys will be within the city. Does not factor in visits to family, countryside and beyond.

Edinburgh Access Panel (0620)

Should demonstrate more commitment to equality of access for disabled people. Highlight reliance of some disabled people on cars.

Goff Cantley (0032), Peter Fantes (0319)

Braid Hills area not mentioned in City Plan and considers plan should state areas where no development should occur.

Jean Morley (0461)

Protect greenbelt in North West of Edinburgh. More consultation required before land is offered to developers.

Jennifer Inglis (0437)

Aims of City Plan are insufficient to achieve net zero targets. Stronger environmental policies are needed.

John Martin (0008)

Strongly supports policies that relate to the protection of the green belt, other green spaces and natural environment. States that stronger measures to address traffic congestion, pollution and climate change are necessary, but whilst some changes to the balance of the use of the public realm are needed, the anti-car position of the 2030 City Plan is too extreme. Considers that the car is good for society in many ways, and sustainable, proportionate motor vehicle use should be supported by supporting technological change to electric vehicles.

Leith Links Community Council (0617)

Concerned by the promise of extended waste management facilities at Seafield, due to proximity to existing and proposed housing. Concerned by lack of provision for upgrading of sewage disposal facilities.

Too much emphasis placed on cycling, and not enough on walking and public transport. Anxious to ensure that accessibility is given adequate consideration in all planning, Public transport and parking policies are currently not well-adapted to the day-to-day travel patterns of diverse and ageing population. Patterns of travel are changing and new



research and due consideration needs to be taken of these changes. Cycle routes need to be segregated from traffic. Need better park and ride facilities serving the north east of the city. New development will put pressure on on-street parking. Needs to be consideration of increasing the number of disabled pick-up/drop-off points, and disabled parking spaces.

Michelle Mckinley (0432)

Consider that the strategy would remove ability to use car which is important for disabled people.

Melford Developments Ltd (0308)

Objects to each of the outcomes as currently articulated. Need to be more precise and articulate a planning purpose together with proportionality and the ability to deliver. Reference to car travel needs to be re-thought in terms of alternatives to allow effective travel internally within the city and to neighbouring locations for employment or leisure purposes. Whilst modal shift is desirable this will not be achieved without improved public transport, further incentives and changes to travel practices. Measures in the LDP are wholly inadequate and are unlikely to facilitate meaningful modal shift over the Plan period.

Mike Richardson (0109)

Notes that at paragraph 2.30 that the policy to reduce private car ownership is continuing. Public transport not suitable for all. Irrelevant to mix up methods of transport and moving around the city with education, health and waste management.

NHS Lothian (0596)

Welcome reference to the provision of primary care facilities however would encourage development of this section further to make reference to NHS Lothian as part of the Edinburgh Health and Social Care Partnership, as well as to the wider healthcare system, in recognition of the full range of facilities and services that are required in relation to public health.

Nicola McCowan Hill (0195)

Comments that aims in paragraph 2.118 all relate to new developments and asks what the Council doing to help and improve the situation for the existing housing stock. Welcomes the shift to sustainable transport modes, however, the current public transport network isn't nearly good enough.

Sport Scotland (0671)

Consider that as there are spatial policy aspects relating to opportunities to be active, it should be referenced in paragraphs 2.37-2.44. Having an understanding what their changing requirements will be is needed and should be part of the evidence base. Consider it would be helpful if preamble to the outcome 'A sustainable city which supports everyone's physical and mental wellbeing' included explicit reference to physical activity and its contribution to this outcome. Suggest reference to need to undertake work to understand the demand for sports facilities in the city (as per Open Space Strategy, p47).

Understand that the Council intend to develop an integrated sport and physical activity strategy for the city and consider this should be referenced as a piece of work which will inform future spatial policy in the city. Suggest that there is a specific definition for 'outdoor sports facilities' in legislation and suggest this be included in the glossary.

Susie Ross (0440)

Considers that the Council is too inefficient to repair roads therefore objectives of City Plan such as eliminating poverty are empty rhetoric.

**A city where everyone shares in its economic success (includes retail and economy)**

Archie Clark (0003)

States that page 35 is aspirational, but it is unclear what the Council will do to help people in poverty. Notes the lack of variety in the retail shopping offer of the city centre and that smaller towns have a greater variety of shops, possibly because of high rents in Edinburgh, and that Edinburgh must be almost unique in not providing a market. Notes that the Town Centres and Local Centres maps show the lack of facilities to support 20-minute neighbourhoods. Notes that the viability of shops is impacted by the need to provision them, the lack of suitable free or affordable parking spaces, and the proposed LEZ. States that map 10 on p36 shows that the centre of town is decanting to the edge of City, even into the green belt at the International Business Gateway. Consider that Bryce Road is not a local centre. Notes that the large new housing estates in Balerno and South Queensferry do not have enough variety of shops within them to support 20-minute neighbourhoods, a situation repeated in other locations in Edinburgh. States that 20-minute neighbourhoods are uncommon in Edinburgh. States that actions described in paragraph 2.148 to keep retail spending and provision under review is insufficient.

Edinburgh World Heritage (0339)

Suggest paragraph 2.138 is amended to include the role of the historic environment to economic success - making Edinburgh an attractive place to live, work and do business.

Grange/Prestonfield Community Council (0192)

Considers that the introduction to the outcome for Edinburgh to become a city where everyone shares in its economic success does not deal with vulnerability to factors outwith the control of the Plan or Council.

Juniper Green and Baberton Mains Community Council (0306)

Considers there should be a clear description of what is to be provided for the 16% of the City's population that live on incomes below the UK poverty threshold

Leith Central Community Council (0614)

Considers plan should provide robust guidance in anticipation of CPO and CSO powers.

NatureScot (0528)

Support the strategy set out in paragraphs 2.138 and 2.139 however consider that the state of nature and the role of natural capital in underpinning Edinburgh's prosperity needs to be more fully and explicitly recognised.

Nuveen Real Estate (0564)

Requests minor changes to the supporting text to provide clarity and require that any future review to respond to changing retail trends be guided by the town centre first principle.

Queensferry & District Community Council (0568)

Objects to the description of Queensferry as a village on p35, it should be described as a town. Concerned inadequate infrastructure is to be provided for a 40% growth in housing units in Queensferry.

SEPA (0012)

Consider outcome for economic success to be linked to mobility. Recommend referring to importance of Nature Based Solutions market in supporting the ecosystem services on which future economic growth relies.

**Modifications sought by those submitting representations:**

**Formatting and mapping**

Archie Clark (0003)

Implies inclusion of map to show Special Landscape Areas.

The conservation area map on p19 should be accompanied by a numbered table listing the conservation areas to aid understanding of the map.

Change format of plan to provide strategic overview and separate plans for different parts of Edinburgh

Simplify language.

Revise sustainable development definition in Glossary to include reference to the 13 principles included in the Scottish Land Use Strategy.

Archie Clark (0003), Leith Central Community Council (0614)

Remove repeated sentence at 2.141

Crosswind Developments (0184)

Improve quality of Map 1 and Map 2 and include policy references.

Dr Helen Forrest (0315)

No modification specified

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Provide all information relevant to a site within site brief.

Edinburgh World Heritage (0339)

At paragraph 3.3 include reference to the importance and method of engaging the local community and wider stakeholders in the development of principles for development of their areas.

Include reference to previous Council documents to include and define relevant historic environment terms.

Include overarching reference to the Edinburgh Design Guidance, associated study and views for protection.

Hallam Land Management (0615)

Correct inaccuracies in Map 1.

Improve clarity of Map 2

Juniper Green & Baberton Mains Community Council (0306)

Improve quality of map, grammar and formatting.

Leith Central Community Council (0614)

Label on-line maps on p17, p19 and & p21.

New Town and Broughton Community Council (0254)

No modification specified however representation implies that maps should be simplified.

NatureScot (0528)

No modification specified however representation implies that the city-wide green blue network should be shown on a map.

Southside Community Council (0781)

Implies plan should be shorter.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Include reference that the Place Briefs, to be prepared, will incorporate the detailed design considerations as set out in "Designing Streets".

**Introduction**

Cockburn Association (0777)

City Plan 2030 should be amended to account of climate impact and preparedness, Covid and post-Covid resilience and Brexit, as well as to be suitable for the end of its lifespan.

More detail about the implementation of 20 minute neighbourhoods should be provided.

Dr Jane Gear (0487)

Include paragraph to explain what measures exist to protect or enhance mental and physical wellbeing of current residents.

Dr Tim Duffy (0503), Scottish Wildlife Trust Lothian Group (0560),

At introduction include reference to the Council's Climate and Biodiversity Emergency declarations.

Edinburgh Access Panel (0620)

Demonstrate more commitment to equality and inclusion issues.

Elsbeth Wills (0293)

No modification is specified but the representation implies that there needs to be a greater variety of shops on the Grassmarket not aimed at tourists, commercial events in Princes Street Gardens should be prohibited, public space should not be commercialised in the Old Town.

No more housing should be used as short-term lets in the city centre.

Public Transport should be improved and action to reduce carbon emissions

Prevent over tourism.

Gilmerton & Inch Community Council (0716)

More details and explanation should be provided about the statements in the plan.

Goff Cantley (0032), Peter Fantes (0319), The Friends of Midmar Paddock, Edinburgh (0121)

No modification is specified but the representation implies that City Plan should state which areas of land are except from development.

Braid Hills should be explicitly mentioned.

Grange/Prestonfield Community Council (0192)

Amend paragraph 1.7 to stress the vulnerability of the LDP to factors outside its control.

At paragraph 1.7 include statement that an early review of City Plan will consider and learn lessons from the application of previous LDP policies.

Include reference to period of the Plan throughout the document.

Hallam Land Management (0615), Tarmac (0244)

Paragraph 1.1 omit the section of text following 'climate change'.

Paragraph 1.2 only state the city vision.

Paragraph 1.3 the target for net zero by 2030 requires a reference.

Paragraph 1.4 Should mention the importance of providing land for market housing. Add at end of the last sentence 'and providing sufficient land to allow for a range of housing types and tenures'.

Paragraph 1.5 omit all but the last sentence.

Paragraph 1.5 should be after para 1.1.

#### Julie Robertson (0210)

No modification is specified but the representation implies that homes should be close to employment.

#### Juniper Green & Baberton Mains Community Council (0306)

Plan should provide references to other documents it mentions.

Plan should explain how existing development will be brought up to new standards.

#### Leith Harbour and Newhaven Community Council (0776)

Paragraph 1.1 should be changed to ensure that culture and heritage is not limited to City Centre.

Paragraph 1.3 should be changed to expand the Low Emissions Zone beyond the city centre.

Paragraph 1.5 should be changed to ensure that it is 'homes' that are being built not 'houses'.

Paragraph 1.6 should be changed to ensure that City plan 2030 protects places of value across the City and adds intergenerational communities to good quality of life.

Paragraph 1.7 should be changed to ensure the use of high density housing is not detrimental to heritage, listed buildings, conservation and waterfront areas.

#### Leith Links Community Council (0617)

Representation implies that paragraph 1.1 should address over-tourism and housing unaffordability for residents.

Representation implies that at paragraph 1.5 the word "communities" should be added.

Representation implies that paragraph 1.5, 1.6 and 1.7 should include commitments to greater community involvement.

Representation implies that City Plan 2030 should show it is cognisant of the impact of the pandemic.

Representation implies that greater explanation of how City Plan 2030 will meet net zero emissions and elimination of poverty aims by 2030.

Representation implies that Local Place Plans should be given more prominence in the plan.

Representation implies that greater detail of how the aims in paragraph 1.4 will be delivered need to be provided, and where resources to pay for the aims will come from.

Mactaggart & Mickel Homes Ltd (0312)

Recognise the role of the private sector in the economic success of the city within the introduction.

Melford Developments Ltd (0308)

Change to be more positive and proactive towards developers and landowners promoting development in the city, focusing on land use development and infrastructure.

Mr T Klan (0307)

Make reference to the importance of providing land for market housing.

At paragraph 1.4 add at end of last sentence “and providing sufficient land to allow for a range of housing types and tenures”.

SEPA (0012)

Refer to ‘regenerative approach’ in opening paragraphs.

At paragraph 1.3 include the Climate Change Strategy and Water Vision, as integral parts of the steps the City of Edinburgh is taking to meet the challenges of climate change.

Sergey Gorobets (0414)

Clarify definition of ‘affordable’ and ‘low cost’ housing.

Allocate land in Midlothian for housing

Southside Community Council (0781)

No modification is specified but the representation implies that additional emphasis needs to be given in the Plan to addressing poverty and inequality.

Thomas Tierney (0400)

No modification specified however representation suggests that costings should be provided and that the Plan should take account of the pandemic.

University of Edinburgh (0464)

No modification specified however representation suggest that the Plan contents should be viewed flexibly.

William Moyes (0305)

No modification specified however representation implies that document quality should be improved and the role of others in delivery should be identified.

Wright PDL (0078)

Economic and social benefits of house building need to be restated.

**Aims**

Andrew Anderson (0535)

No modification is specified but the representation implies that the Plan should provide more measurable and realistic objectives.

Andy Inglis (0138)

At aim 1 use stronger wording than “better”

Anna Brand (0742)

No modification is specified but the representation implies that City Plan should strive for an absolute zero carbon target rather than a net zero target.

Archie Clark (0003)

No modification specified however representation implies that those with mobility difficulties should be considered.

Arnold Myers (0758), Jennifer Hess (0771)

Prioritise preservation of open space over development.

AREAA (0358)

No modification is specified but the representation implies that aim 2 should be modified to allow for use of greenfield sites where there is an identified need.

Bo Adams (0363)

No modification specified however representation implies that all new developments should be required to have shops, restaurants, schools and GPs.

Brian Tiplady (0641)

No modification is specified but the representation implies that City Plan should prioritise public transport alongside commitment to active travel and 20-minute neighbourhood agenda.

CBRE Global Investors (0644), Nuveen Real Estate (0564), Nuveen Real Estate (0734)

Amend aim 10 to:

“Deliver Edinburgh’s key economic land use needs, including supporting the city centre and wider defined hierarchy of centres, Edinburgh Waterfront, West Edinburgh, the Edinburgh BioQuarter, retail and leisure, and land for modern business space as part of



housing-led mixed-use development and deliver policies which support businesses to thrive.”

Cramond & Barnton Community Council (0243)

At Aim 2 p.8 and Map 7, p.27 recognise that several sites identified in City Plan as brownfield sites are current industrial and/or commercial estates.

At Aim 2, p8 include a commitment that the Council will conduct robust assessments of the potential impacts of displacing current businesses, or otherwise affecting their viability and operational requirements, to enable residential development, and means of mitigating any adverse economic or operational impacts on the current businesses.

Douglas Tharby (0148)

Reorder aims - aims 8 and 9 should be aims 1 and 2.

Dr David Houston (0655)

No modification is specified but the representation implies that City Plan should revise the aims to be more realistically achievable focussing on redevelopment.

Edinburgh Chamber of Commerce (0379)

At paragraph 1, 20 minute neighbourhood policy should be more nuanced to also protect city centre businesses.

Edinburgh Napier University (0731)

Aim 1 should be amended to include reference to walking, wheeling and cycling.

Edinburgh World Heritage (0339)

Add aim “Actively conserving and enhancing Edinburgh’s World Heritage Sites and wide range of heritage assets for the cultural, social, environmental and economic benefits they bring.”

Amend part 4 of paragraph 2.2 to: “Requiring all new building to have very low embodied carbon and be net-zero...”

Frances Guy (0589)

At aim 1 Provide detail on services to be within a 20-minute walk

At aim 4 recognise the need to retrofit housing stock to reduce emissions.

Graeme Parry (0230)

Include more consideration of infrastructure requirements

Hallam Land Management (0615), Tarmac (0244)

Provide evidence and detailed justification for how 20-minute neighbourhoods will be retrofitted into the spatial strategy, and how major strategic and economic designations will relate to this.

Amend paragraph 2.1 to read “City Plan is an ambitious vision that will drive investment into the city for the benefit of all communities. We want the future growth of our city to be sustainable and net zero balancing these factors with economic growth and a generous supply of land for housebuilding.”

Aims 6, 8 and 10 should be prioritised above other aims.

Aim 2 should be amended to read “Where possible directing new development and maximising the use of brownfield land rather than greenfield land. Delivering new or extended communities on suitable land that will deliver economic social and environmental benefits “.

Aim 4, sentence 2, should be amended to make sense. Representation implies aim 4 should be altered to be within the scope of development planning.

Aim 5 should omit “protect our beautiful green setting” and include, “protect valuable areas of greenbelt and countryside”.

Aim 6 should be amended to read ‘Developing land to fully meet Edinburgh’s housing needs over the next decade and securing a minimum of 35% affordable housing contribution from new developments across the city.’

Aim 10 should omit “as part of housing led mixed use development.”

Policies relating to sustainable buildings and net zero should be moved to guidance documents.

Homes for Scotland (0404), Steve Loomes (0767)

No modification specified.

Jay Chimo (0674)

No modification is specified but the representation implies that Edinburgh should not be densified or developed any further.

John Bremner (0140)

City should not grow

At Aim 2 brownfield should be only option.

At Aim 6 make clear that no greenbelt would be used.

At Aim 8 representation suggest removal of infrastructure first approach.

Development should be high density.

Short-term lets should be limited.

Juniper Green & Baberton Mains Community Council (0306)

Aims should be described in more detail.

Set out key community facilities for 20 minute neighbourhood.

Provide map indicating current service provision and where there are gaps in provision.

Provide a glossary of acronyms.

At Aim 2 require the conversion of existing buildings over demolition, as well as requiring buildings to be designed to be easily repurposed in future.

Prevent greenfield development in all circumstances.

On page 4, Table 11 a reference to the proposal to expand Currie Community High School and its cost should be made.

Account for existing development and extant permissions in its development.

Requests further detail about how 20 minute neighbourhoods will be applied to existing communities.

Leith Harbour and Newhaven Community Council (0776)

No modification is specified but the representation implies that consideration should be given to compatibility of high density neighbourhoods and intergenerational integration.

Include clarification regarding approval of legislation for the implementation of Local Place Plans.

Lynn Grattage (0362)

Change Aim 2 to ""Directing new development to brownfield sites, and some greenfield sites within the city boundary, currently used for agriculture, with the proviso that large parks are provided in areas where fields existed, to allow access to nature, and ensure good air quality can be maintained."

Melford Developments Ltd (0308)

The 10 aims should be prioritised in importance, with housing, economic development and mixed uses prioritised above other aims.

Michael Ramsay (0011)

Target should be net zero for the city in the future while maintaining its character and heritage.

Murray Estates (0197), Stewart Milne Homes (0118)

Alter aim 10 to safeguard employment land in existing use otherwise amend Aim 10 to acknowledge the negative consequences.

Nicola McCowan Hill (0195)

No modification specified but implies strategy will not meet the aims.

Patricia Willder (0205)

Development on greenfield sites should only be permitted after all brownfield sites have been developed.

Robert Falcon (0640)

No modification is specified but the representation implies that City Plan should not allow development in West Edinburgh until other brownfield sites are developed.

RSPB Scotland (0648)

Ensure appropriate ecological survey work is conducted on mature brownfield sites which are wildlife corridors.

Sarah Adamson (0523)

No modification is specified but the representation implies that brownfield sites should not be developed in order to protect wildlife corridor.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Page 8, Paragraph 2.2 bullet 2 consider how it could take a stronger planning policy position in relation to vacant and derelict land and buildings in line with policy as proposed in the recently published draft NPF4.

Shortbread House (0619)

No modification specified however representation suggests that active employment sites should not be allocated for housing development.

Southside Community Council (0781)

Each section should demonstrate how it helps achieve Aim 2 and a stronger statement on the prioritisation of brownfield sites for development should be made.

Greater details of how 20 minute neighbourhoods will be implemented should be included.

Susie Ross (0440)

No modification is specified but the representation implies that City Plan should create more realistic and achievable aims.

The Royal London Mutual Insurance Society Ltd (0149)

Amend Aim 2 to read "Directing new development to, and maximising the use of, brownfield land rather than greenfield land, improving and re-imaging Edinburgh's neighbourhoods, rebuilding the city from within and delivering new communities whilst ensuring the needs of business and industry are met in Edinburgh Waterfront, West Edinburgh and on other major development sites across the city."

Amend Aim 10 to read – “Deliver Edinburgh’s key economic land use needs, including supporting the city centre, Edinburgh Waterfront, West Edinburgh, the Edinburgh BioQuarter, local centres, retail and leisure, business and industry in the wider urban area and deliver policies which support businesses to thrive.”

### **National strategies**

#### Andy Inglis (0138)

No modification is specified but the representation implies that City Plan should give more consideration to the needs of animals and set a wider range of metrics for the city’s success than economic growth.

#### Archie Clark (0003)

Encourage food growing

Provide clarity on water management

#### Cockburn Association (0777)

Set out analysis and explanation of how City Plan will achieve net zero targets, and how public health outcomes will be delivered.

#### Edinburgh World Heritage (0339)

At page 11/12 add reference to and proportionate description of:

The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and other relevant historic environment legislation

The Historic Environment Policy for Scotland (Historic Environment Scotland)

At page 13 add reference to and proportionate description of the Old and New Towns of Edinburgh World Heritage Site Management Plan.

#### Grange/Prestonfield Community Council (0192)

No modification specified.

#### Hallam Land Management (0615) Tarmac (0244)

Revise paragraph 2.5 to provide a more accurate and detailed description of the Planning Scotland Act in relation to LDP.

Update paragraph 2.14 in relation to NPF4.

Revise paragraph 2.16 on minimum housing land figures as reflected in the Housing Technical Note.

Update paragraph 2.17 in relation to the Strategic Transport Projects Review 2.

Revise paragraphs 2.18 and 2.19 to more closely and accurately reflect SPP particularly in relation to housing land, economic development and greenbelt and countryside.

Revise Paragraph 2.22, 2.23 and 2.24 in relation to NPF4 and the Regional Spatial Strategies.

Leith Harbour and Newhaven Community Council (0776)

Amend paragraph 2.18 to “Scottish Planning Policy sets out plans that (should) must be designed around local area characteristics etc. and ‘Placemaking (needs) must ensure strategies are linked to design policies.”

Amend paragraph 2.33 to ‘The City Housing Strategy enforces priority for delivering housing and related services across all tenures and types of housing’.

Leith Links Community Council (0617)

No modification specified however suggest that the strategy should take account of the pandemic.

Policies should require a high standard of design.

Melford Developments Ltd (0308)

Align plan with other strategies and plans.

NHS Lothian (0596)

At paragraph 2.35, include a new paragraph that makes reference to key health and care strategies for the city, including the Lothian Strategic Development Framework and the Edinburgh Integration Joint Board Strategic Plan.

Robyn Kane (0091)

No modification specified.

Roger Thomas (0345)

At paragraph 2.11 remove "Strategic enhancement of Edinburgh Airport".

At paragraph 2.17 include flying alongside private car use.

Southside Community Council (0781)

Set out how City Plan 2030 will integrate with NPF4 and Council's plans and strategies.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

At 2.11 consider the recently published draft NPF4, and the emerging position in relation to national developments.

At page 11-12 National Context include reference to and explanation of the National Marine Plan 2015.

At page 11-14 Section: “National, regional, local context” - reference the Scottish Government’s Heat in Buildings Strategy, and the Heat Network delivery targets in section 92 of the Heat Networks (Scotland) Act 2021.

At page 13 Reference to the need for alignment with any future regional marine plan, either in the ‘Regional context and change’ section or in any of the subsequent policy chapters.

At page 13 Regional context and change - reference the City Region Deal for Edinburgh and South East Scotland and highlight any spatial implications or consequences arising from this.

#### SEPA (0012)

At paragraph 2.7 change the Climate Change (Scotland) Act 2019 to The Climate Change (Emissions Reduction Targets) (Scotland) 2019.

### **A sustainable city which supports everyone’s physical and mental wellbeing**

#### Alexander Sutherland (0193)

Development should not be permitted on the green belt or designated countryside areas where this would impact on food growing opportunities.

#### Andrew Heald (0566)

Include on page 24 reference to i-tree survey and Edinburgh’s Trees in the City Action Plan – published in 2014.

Infers amendment of paragraph 2.70 to state that 310,000 trees will be required by 2030.

#### Archie Clark (0003)

Masterplans should be produced by the Council, not private developers.

Second bullet point of paragraph 2.58 should read: “protect and enhance the quality, character, landscape setting and identity of the city and neighbouring settlements and prevent coalescence”.

No LEZ.

No maximum limits on parking spaces in new development.

#### Cockburn Association (0777)

At paragraph 2.45-46 include outcome statement that a commitment be given that Edinburgh’s unique urban landscape will be improved through active conservation policies and innovative design policies so that the qualities of the city are improved by the end of the Plan period.

At paragraph 2.47-48 include commitment that the Management Plan for the World Heritage Site will be a material consideration.

At paragraph 2.49-2.56 include a firm outcome statement to the effect that the city heritage assets will form a key part of the delivery of the plans economic and environment policies and the Plan commits to improvements to all assets where possible.

Include an outcome statement which makes clear that proposals affecting heritage assets and conservations areas considered by non-planning mechanisms such as Traffic Regulation Orders will be required by City Plan to meet the policy objects set out within it.

Include policy advocating protection of private green spaces such as the large, treed gardens in the inner suburbs.

Cramond & Barnton Community Council (0243)

At paragraph 2.36 amend outcome to me: “A sustainable City, progressing to net zero, which cherishes and maintains its built and natural heritage and supports everyone’s well-being”.

Edinburgh World Heritage (0339)

At paragraphs 2.45 and 2.46 reflect the wider contribution the historic environment makes to social, environmental and economic health.

Add an additional bullet to paragraph 2.62 as follows:

- Protecting the intrinsic heritage values and assets of green and blue network of the Old and New Towns of Edinburgh World Heritage Site and other designated heritage assets

Grange/Prestonfield Community Council (0192)

At paragraph 2.58 strengthen protection of the green belt.

Homes for Scotland (0404), Steve Loomes (0767)

Remove requirement for 65 dwellings per hectare.

Relax green belt policy.

Jean Morley (0461)

No modification is specified but implies protection of green belt in North West Edinburgh.

Jennifer Inglis (0437)

Include policy assessing and minimising carbon of the whole life cycle of developments.

Include policy that presumes against felling of mature trees, loss of green space and demolition of buildings without a clear assessment that they cannot be refurbished or re-purposed are necessary.

Include policy that addresses the environmental impact of building design choices.

John Torrance Glencross (0509), Oliver Glencross (0489)

No modification is specified but the representation implies that City Plan should revise open space strategy for Cramond to provide more greenspace.



Juniper Green & Baberton Mains Community Council (0306)

No modification is specified but the representation implies masterplans should be prepared by the Council.

Set out further information about Place Briefs and how they will facilitate early stakeholder engagement.

Restrict development to the existing city footprint.

Leith Central Community Council (0614)

Representation implies that a Strategic Flood Risk Assessment should be produced for City plan 2030.

At paragraph 2.45 and 2.46 include industrial built heritage.

Leith Central Community Council (0614)

At paragraph 2.45 and 2.46 include industrial built heritage.

Leith Harbour and Newhaven Community Council (0776)

At paragraph 2.42, replace 'should' with 'will' in 1st sentence. Replace 'can' with 'will' in 3rd sentence

At paragraph 2.46 other areas of the city should be named including Leith.

At paragraph 2.49 - 2.52 Areas. Buildings should be restored/redeveloping buildings rather than demolished to help a carbon free environment

At paragraph 2.57 the natural environment in Leith should be protected by preventing tree removal, new hard standing and Astro Turf.

Amend paragraph 2.68 - 2.70 to not contradict Env 20.

Liz Glass (0645)

No modification specified however representation implies native species should be prioritised to prevent spread of disease.

Mark Ockendon (0419)

Add reference to the importance of the sky.

Melford Developments Ltd (0308)

Provide more precise outcome and articulate a planning purpose together with proportionality and the ability to deliver.

Mr John G. Skinner (0065)

No modification specified however representation suggest that views of the city should be protected.

NatureScot (0528)

Amend paragraph 2.58 to include the purpose of green belt in supporting new uses that enhance climate resilience and emission reductions, provide access to green networks and support nature networks.

Amend paragraph 2.79 to “City Plan has had regard to current and ongoing work undertaken by Glasgow University and NatureScot which considers a range of coastal processes and predicted change. It has also had regard to related work on Strategic Flood Risk Assessment being undertaken by City of Edinburgh Council, Scottish Water, Dynamic Coast and SEPA.”

#### Ratho and District Community Council (0289)

No modification specified but consider low carbon city to be ambitious.

#### Roger Thomas (0345)

More detail should be provided to ensure that new development has a presumption in favour of sandstone and slate.

Mention should be made here that alterations in conservation areas should use building materials which blend in with existing materials so as not to dilute the area's character and that normally these materials will be appropriate natural sandstone and slate.

#### Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Amend 2.52 to “In conservation areas, conservation area consent is required for demolition of buildings. Additionally planning consent may be required for some developments, such as window alterations to a house or flat, which elsewhere in the city would not generally require a specific grant of planning permission. This additional level of control helps to ensure that small scale incremental changes do not damage the character or appearance of the conservation areas. The Proposals Map and Appendix A show which parts of the city are covered by conservation areas.”

At paragraphs 2.54-2.56 insert: “Any works directly affecting a designated Scheduled Monument require Scheduled Monument Consent (SMC) which is obtained from Historic Environment Scotland. Advice on the SMC process and requirements should be sought at an early stage from Historic Environment Scotland.”

#### SEPA (0012)

At paragraph 2.39 add “The current pandemic has emphasised the importance of citizens’ hyperlocal’ environment. Embedding nature-based solutions /blue-green infrastructure in our neighbourhoods will be key to maximising place-led benefits including mental and physical health whilst supporting climate resilience.”

#### Sport Scotland (0671)

At paragraphs 2.37-2.44 include specific reference to physical activity and its contribution to this outcome.

At paragraphs 2.62-2.64 refer to need to undertake work to understand the demand for

sports facilities in the city (as per Open Space Strategy, p47). Refer to council intention to develop an integrated sport and physical activity strategy.

Include in Glossary definition for 'outdoor sports facilities' in legislation and suggest this be included in the glossary.

#### Stirling Developments (0303)

No modification specified however representation implies that new homes should be delivered close to existing employment clusters and sustainable development should be supported where it can benefit economic aims.

#### The Association for the Protection of Rural Scotland (0334)

At paragraph 2.58, 2<sup>nd</sup> bullet include opportunities to enhance the protection of peri-urban countryside by Green Belt designation.

At paragraph 2.58-2.60 include reference to the contribution of green belt to tackling climate emergency through storing carbons in soils and woods and contain significant areas of prime agricultural land, important for home grown food production, and of semi-natural woodland, valuable for carbon storage. And role in providing a nature network to preserve biodiversity.

At paragraph 2.68 -2.70 refer to the need to monitor the health of the City's trees.

#### University of Edinburgh (0464)

Strengthen the importance of health and wellbeing in design and the provision of facilities.

#### Wright PDL (0078)

No modification specified.

### **A city which everyone lives in a home they can afford**

#### Archie Clark (0003)

At paragraph 2.88 add that where brownfield land is to be developed, the historic use of the land should be retained.

#### David McGowan (0168)

No modification is specified but the representation implies that expansion of the city should not be allowed to impact on resident's amenity.

#### The Davidson's Mains and Silverknowes Association (0454), Douglas Tharby (0148)

No modification specified.

#### Edinburgh World Heritage (0339)

At page 26 note the reduction for demand in retail in some areas to re-introduce much-needed housing supply, also enhancing their historic character/use.

Grange/Prestonfield Community Council (0192)

At paragraph 2.92 add “The impact of this policy change will be regularly monitored throughout the Plan period so see how it relates to other social housing provision, to enable further change to be introduced if necessary.”

Kathryn Poolman (0574)

No modification is specified however representation implies that the city centre should be re-populated.

NHS Lothian (0596)

No modification specified however representation implies that there should be consideration of healthcare requirements created by new housing.

Nicola McCowan Hill (0195)

No modification specified however representation suggests that greenfield sites should be allocated.

Peter Allen (0336)

No modification specified but implies that City Plan should support community-led custom housing projects through policy and land allocation.

Roger Thomas (0345)

Strengthen paragraph 2.94 by including ‘short term lets’ and ‘second homes’ in description of ‘other uses’

Simon Thomson (0248)

At paragraph 2.101 delete 20,000 figure and replace with “building sufficient affordable homes to meet assessed demand”.

Amend Paragraph 2.109 to reflect need for appropriate densities based on site context rather than a defined minimum.

Amend paragraph 2.2, 2.88, 2.110 and 2.112 to reflect the allocation of greenfield sites that can be sustainably developed

Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

No modification specified however representation suggests that greenfield sites should be allocated.

An assessment of the infrastructure requirements of each housing allocation should be undertaken.

Tessa Haring (0112)

No modification is specified but the representation implies that the number of short-term lets in Edinburgh should be reduced.

**A city where you don't need to own a car to move around (includes transport and infrastructure)**

David McGowan (0168)

No modification is specified but the representation implies transportation options in the city need to be improved, and that cycling should not be provided for.

Douglas Tharby (0148)

No modification specified.

John Martin (0008)

No modification is specified but the representation implies that stronger measures to address traffic congestion, pollution and climate change should be taken, but not measures that are anti-car.

Leith Links Community Council (0617)

No modification specified however representation suggests:

Provision for upgrading of sewage disposal facilities.

More emphasis on walking and public transport.

Segregation of cycle routes.

Increase in disabled drop off points and parking spaces.

ew park and ride facilities for north east of city.

Melford Developments Ltd (0308)

Provide more precise outcome and articulate a planning purpose together with proportionality and the ability to deliver.

Michelle Mckinley (0432)

No modification is specified but the representation implies that City Plan should ensure disabled car users have access to the city.

Mike Richardson (0109)

No modification specified however representation implies that policies should allow for private car ownership.

NHS Lothian (0596)

At paragraph 2.125 make reference to NHS Lothian as part of the Edinburgh Health and Social Care Partnership, as well as to the wider healthcare system, in recognition of the full range of facilities and services that are required in relation to public health.

Nicola McCowan Hill (0195)

No modification specified however representation implies that public transport should be improved and plan should set out how existing areas will be addressed in terms of 20-minute neighbourhoods.

### **A city where everyone shares in its economic success**

#### Archie Clark (0003)

At paragraph 2.33 provide a description of what is to be provided for the 16% of the city's population that live on incomes below the UK poverty threshold.

No modification specified but implies that Council needs to act to improve the variety of the retail offer in Edinburgh city centre, in each 20 minute neighbourhood.

No modification specified but implies more free parking or affordable should be prevented in the city centre and the LEZ should not be implemented.

No modification specified but implies that Bryce Road and other similarly sized centres should not be designated as Local Centres.

Reword paragraphs 2.143 to 2.144 to be clearer.

#### Edinburgh World Heritage (0339)

Amend paragraph 2.138 to include the role of the historic environment to economic success - making Edinburgh an attractive place to live, work and do business.

#### Grange/Prestonfield Community Council (0192)

At paragraph 2.138 set out what would be done to address a situation if inward investment to the level required is not available or affordable and therefore what has priority.

At paragraph 2.140 add "These aims do not over-ride other LDP policies."

#### Juniper Green and Baberton Mains Community Council (0306)

Provide a description of what is to be provided for the 16% of the City's population that live on incomes below the UK poverty threshold.

#### Leith Central Community Council (0614)

Provide guidance in plan on CPO and CSO.

#### NatureScot (0528)

Amend paragraph 2.139 to "The strength of Edinburgh's economy is based on a range of key sectors and assets, for example, tourism, financial services, life sciences and higher education. Edinburgh also has a wide range of natural, cultural, arts and sports venues and places which bring economic benefits as well as enhancing the wellbeing of residents and visitors."

#### Nuveen Real Estate (0564)

Update paragraph 2.146 to refer to the 'St James Quarter', in place of 'Edinburgh St James'.

Strengthen paragraph 2.148 to require that any future review be guided by the town centre first principle.

Queensferry & District Community Council (0568)

On p35 describe Queensferry as a town.

SEPA (0012)

At p35 refer to the importance of Nature Based Solutions Market in supporting the ecosystem services on which the future economic growth relies.

### **Summary of responses (including reasons) by planning authority:**

#### **Plan Format and Mapping**

Archie Clark (0003), Crosswind Developments (0184), Juniper Green & Baberton Mains Community Council (0306) Leith Central Community Council (0614), New Town and Broughton Community Council (0254), Southside Community Council (0781)

An exercise has been undertaken to identify formatting and mapping inaccuracies. A table of technical amendments has been submitted which address the concerns raised. Maps 1 and 2 are diagrammatic. The scale of map does not allow for policy references to be included. Allocations and designations are shown on the proposals map which forms part of the plan. The Plan has been set out to be user friendly and is organised into clear sections identified by colour coding. Page 4 sets out how to use the plan. While the document is lengthy this is necessitated by the scope of the content. The Plan contains a glossary of terms and where acronyms are used the full text is included as an initial reference. **No modification proposed.**

Archie Clark (0003)

The proposals map and online map provide the boundaries of the special landscape areas. This is stated in paragraph 2.66. It does not state that a map is provided within the written statement. It would not be practical to include them within the Plan due the scale of map which would be required. **No modification proposed.**

The map provided at page 19 is illustrative. The proposals map and online map provide the detail of conservation area boundaries. **No modification proposed.**

The Plan is set out in parts. Part One provides the strategy for the whole Edinburgh area and Part Two provide place based policies. The Plan therefore does provide area specific policies along with those set out in Part Three which apply across the area. **No modification proposed.**

The definition of sustainable development within the Glossary is in line with Scottish Planning Policy (CD096). **No modification proposed.**

Dr Helen Forrest (0315)

The Plan has been set out to be user friendly and is organised into clear sections identified by colour coding. Page 4 sets out how to use the plan. While the document is lengthy this is necessitated by the scope of the content. The Plan contains a glossary of terms and where acronyms are used the full text is included as an initial reference. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Place policies in the Plan set out site specific requirements. Other policies of the Plan will apply however it is not possible to specify which policies which apply as this will be dependent on the individual proposals which come forward. The online proposals map identifies the relevant proposals and policies for individual locations. **No modification proposed.**

Edinburgh World Heritage (0339)

It is not necessary to set out methods for the preparation of place briefs within the Plan. The process is most appropriately addressed on an individual basis to provide the most appropriate approach for the circumstances. **No modification proposed.**

Historic environment policies in the plan, and in particular paragraph 3.119, refer to Council documents and Historic Environment Scotland guidance which provide detail and definition of terms. **No modification proposed.**

Paragraph 3.151 refers to the Council's study which identifies key public viewpoints and makes reference to the Council's Edinburgh Design Guidance (CD047). **No modification proposed.**

Hallam Land Management (0615)

The representation does not specify the inaccuracies on Map 1 Spatial Strategy. An exercise has been undertaken to identify mapping inaccuracies. This identifies some technical changes to the Spatial Strategy map. **No modification proposed.**

NatureScot (0528)

The green blue network is set out in Map 3, p26 of the plan. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Paragraph 3.3 sets out the place based policies of the plan. Policy Env 1 addresses design quality and context and Env 2 encourages a comprehensive approach to development through Place Briefs to identify the full potential for creating successful places. The role of Designing Streets and how this applies to development Edinburgh is set out in the Council's Edinburgh Design Guidance (CD047). **No modification proposed.**

**Introduction**

Cockburn Association (0777)



The Plan sets out environmental policies to deal with climate change mitigation and adaptation, reduce flooding and other climate impacts. The long term impacts of the pandemic and Brexit are unknown. The policies of the Plan allow sufficient flexibility. The Plan has been prepared for the period of 2022-2032. The 20-minute neighbourhood principle is embedded in the Plan policies. These provide the detail of implementation.

**No modification proposed.**

Dr Tim Duffy (0503), Scottish Wildlife Trust Lothian Group (0560),

Paragraph 1.1 refers to the impacts of climate change. Paragraph 2.31 refers to the climate emergency as a policy driver and there are references to the climate emergency within the relevant policies. Aims 5 includes increasing biodiversity and Policies Env 31 and Env 37 address biodiversity. **No modification proposed.**

Dr Jane Gear (0487)

The introduction sets out what the Plan does and how it works with other strategies. Paragraphs 2.37-2.87 provides details of how the Plan improves the physical and mental wellbeing of residents and the importance of maintaining and enhancing Edinburgh's built and natural environment. The strategy proposals and policies set out within the Plan take a place-based approach to deliver greater equality in health, wellbeing and sustainability outcomes through the delivery of 20-minute neighbourhoods. Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process. **No modification proposed.**

Edinburgh Access Panel (0620)

Addressing inequality is integrated within the plan. As set out within the four outcomes at paragraphs 2.4-2.35 the Plan addresses inequality in a number of ways. This includes aims to ensure that everyone has access to a range of amenities, a range of house types that are adaptable, access to green blue network and creating accessible places. While car parking free or low parking developments are encouraged in the Plan it sets a requirement to meet accessible parking standards. Equality of access is appropriately addressed through individual proposals and the Edinburgh Design Guidance (CD047) provides detail on the need for Access Statements. **No modification proposed.**

Elsbeth Wills (0293)

Impacts of tourism development are addressed through the policies of the plan. It is not possible to control the occupiers of shops. The use of open spaces is outwith the scope of the local development plan. Policy Hou 7 Loss of Housing addresses the use of dwellings for short-term lets. The Plan safeguards land for future public transport improvements. Place policies and development principles identify requirements for public transport improvements for allocated sites. **No modification proposed.**

Gilmerton & Inch Community Council (0716)

Paragraph 1.1-1.7 set out an introduction to the Plan and further detail is then set out within the plan. Paragraphs 2.37 -2.148 set out detail of the statements made. **No modification proposed.**

Goff Cantley (0032), Peter Fantes (0319), The Friends of Midmar Paddock, Edinburgh (0121)

The City Plan spatial strategy identifies the areas of the city where development is directed and also the areas of countryside and green belt where development is not supported except under certain circumstances set out in policy Env 18 and Hou 4. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

It is not necessary to refer specifically to external factors at paragraph 1.7. The paragraph sets out what the Plan does and how it will be used to guide development. **No modification proposed.**

It is not necessary to refer to the 2022-2032 period continuously throughout the document. The period of the Plan 2022-2032 is set out within paragraph 1.6 of the introduction. Where specific targets are provided for the Plan period the period of 2022-2032 is stated. **No modification proposed.**

The City Plan Monitoring Statement (CD023) assesses the effectiveness of current planning policies. It is not necessary to refer to this within the introduction which is forward looking. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

It is suggested that text is removed from paragraph 1.1 which states that there are poverty and health inequalities, demand for new homes, rising housing costs, traffic congestion and poor air quality. The Council do not accept this deletion. The references are relevant to the outcomes of the plan. **No modification proposed.**

Text at paragraph 1.2 states the Council's commitment to change and sets out the City Vision. The Council and others have signed up to this vision. The text simply set out the themes of the Vision. **No modification proposed.**

Paragraph 1.3 refers to the target for the city to be net zero by 2030. Paragraph 2.7 contains further reference to targets to achieve net zero. **No modification proposed.**

Paragraph 1.4 sets out the commitments of the Council. It is not necessary to include within this section reference to sufficient land for a range of types and tenures. This detail is contained with paragraphs 2.88- 2.110. **No modification proposed.**

The suggestion to remove text from paragraph 1.5 is not accepted. The text sets out what is required to meet objectives. **No modification proposed.**

Re-ordering of paragraphs to place 1.5 following 1.1 is not accept. Paragraphs 1.1-1.4 set out what the Council wish Edinburgh to be and 1.5 sets out what needs to be done. The ordering is therefore correct. **No modification proposed.**

The Plan does not prevent new development. Reference is made within paragraph 2.89 to the need for homes to support economic growth. The introduction sets out the need for future growth to meet ambitions for a climate ready city. It focusses on achieving development while meeting this need. Paragraph 2.27-2.35 sets out the policy drivers which are the Council's three main area for change – becoming a sustainable and net zero city, ending poverty by 2030 and delivering wellbeing and equalities. Paragraphs 2.37-2.148 set out how the Plan can achieve the outcomes set out in paragraph 2.36. **No modification proposed.**

#### Hallam Land Management (0615)

The Proposed Plan was approved by the Council's Planning Committee on 29 August 2022. It therefore represents the settled view of the Council. The Council does not consider there have been procedural irregularities. Infrastructure costs will be set out in the Plan's Action Programme. The Plan is supported by an SEA set out in the Environmental Report (CD010), Integrated Impact Assessment (CD013), Strategic Flood Risk Assessment (CD011), Habitat Regulations Appraisal (CD012), Transport Appraisal (CD014), Education Appraisal (CD015) and Healthcare Appraisal (CD016). **No modification proposed.**

#### Julie Robertson (0210)

The Plan aims to deliver a network of 20-minute walkable neighbourhoods and create mixed use neighbourhoods. It supports business use in town and local centres. The Plan therefore aims to ensure that employment opportunities are available as part of a mix of uses including residential. **No modification proposed.**

#### Juniper Green & Baberton Mains Community Council (0306)

It is not within the scope of the local development plan to address the standard of existing development. The Plan addresses new development. Where change of use of exiting development is proposed policies of the Plan set out the approach to design which includes sustainability measures. **No modification proposed.**

#### Leith Harbour and Newhaven Community Council (0776)

The statement on culture and heritage refers to the whole of Edinburgh and is not limited to the city centre. There is therefore no requirement to state at paragraph 1.1 that this is not limited to the city centre. **No modification proposed.**

The low emissions zone is subject to separate legislation and process and it is not within the scope of the local development plan to determine the extent of any low emission zone, consequently paragraph 1.3 should not be changed. **No modification proposed.**

Paragraph 1.5 as worded only refers to homes and not houses therefore no amendment is needed. **No modification proposed.**

Paragraph 1.6 sets out that the Plan protects places of value. The Plan applies across the Council area and it is not considered necessary to provide any specific reference to this protection applying across the city. **No modification proposed.**

The protection of built heritage is set out within the policies of the plan. It is not appropriate to refer to this within paragraph 1.7. The purpose of this paragraph is to set

out what the Plan does and how it will be used to guide development. **No modification proposed.**

Leith Links Community Council (0617)

Paragraph 1.1 sets out a general statement on Edinburgh and makes reference to the need for new homes and rising housing costs. Impacts of tourism development are addressed through the policies of the plan. **No modification proposed.**

Paragraphs 1.5-1.7 set out what the Plan is and what its purpose is. There is no need to make specific reference to communities within these paragraphs. Reference to communities is made throughout the Plan and place policies set out that local communities will be consulted through the development of place briefs. The long term impacts of the pandemic are not known. The policies of the Plan allow sufficient flexibility. **No modification proposed.**

Paragraph 2.21 identifies the 20-minute neighbourhood approach to addressing net zero carbon and paragraphs 2.28-2.32 provide further information on the role of the Plan in becoming a net zero city. Paragraph 2.33 sets out the ways in which the Plan can contribute towards elimination of poverty. **No modification proposed.**

Support for Local Place Plans is provided at Aim 3 and this is considered sufficient reference. **No modification proposed.**

Paragraph 1.4 sets out a commitment to eliminating poverty, ensuring residents have enough money to live on, have access to work, learning and training opportunities and have a good place to live. The Plan sets out the policies and proposals to contribute to achieving these aims. Policies and proposals address infrastructure requirements for development. **No modification proposed.**

Mactaggart & Mickel Homes Ltd (0312)

The introduction sets out the role of the Council and the Plan in achieving the city vision. It is not appropriate to refer to the role of the private sector in this context. **No modification proposed.**

Melford Developments Ltd (0308)

The introduction sets out the need for future growth to meet ambitions for a climate ready city. It focusses on achieving development while meeting this need. Paragraph 2.27-2.35 sets out the policy drivers which are the Council's three main area for change – becoming a sustainable and net zero city, ending poverty by 2030 and delivering wellbeing and equalities. It is therefore appropriate for the introduction to reflect this. **No modification proposed.**

Mr T Klan (0307)

Reference is made within paragraph 2.89 to the need for homes to support economic growth. The introduction sets out the need for future growth to meet ambitions for a climate ready city. It focusses on achieving development while meeting this need. Paragraph 2.27-2.35 sets out the policy drivers which are the Council's three main area for change – becoming a sustainable and net zero city, ending poverty by 2030 and delivering

wellbeing and equalities. It is therefore appropriate the for the introduction to reflect this. The Plan is supportive of housing development in appropriate locations. Paragraph 1.4 sets out the commitments of the Council. It is not necessary to include within this section reference to sufficient land for a range of types and tenures. This detail is contained with paragraphs 2.88- 2.110. It is not the purpose of the introduction to set out development opportunities. The spatial strategy identifies where development is proposed. **No modification proposed.**

#### SEPA (0012)

The introduction sets out an approach which focusses on responding to climate change and addressing inequalities. Paragraph 1.5 sets out that this involves addressing climate change objectives as an integral part of all development as it set out the need to build homes to the highest emissions quality standards resilient, connected neighbourhoods, in the right location with the right infrastructure and also to support business and promote an inclusive wellbeing economy. This essentially sets out the regenerative approach referred to therefore it is not considered that this needs to be made explicit. **No modification proposed.**

Paragraphs 2.27 - 2.35 set out the policy drivers at an Edinburgh level. The Water Management Vision is referred to in this section and also at paragraph 2.76. Paragraph 2.28 refers to the draft 2030 Climate Strategy. It is considered to be appropriate to set out these strategies within this section rather than within the introduction. The 2030 Climate Change Strategy (CD064) was produced in December 2021 following the publication of the proposed plan. The Council acknowledges that the reference should be corrected as a minor drafting/technical matter. **No medication proposed.**

#### Sergey Gorobets (0414)

The definition of affordable housing is set out in the Glossary. The Council's non-statutory Guidance on Affordable Housing (CD053) sets out definitions of housing tenures including low cost housing. It is appropriate for this level of detail to be contained within guidance. The low emissions zone is subject to separate legislation and process and it is not within the scope of the local development plan. The Plan relates to the Edinburgh area and cannot make allocations within other local authority areas. The approach to meeting the housing need and demand in Edinburgh is set out in paragraphs 2.88-2.110. The Plan allocates sufficient land to meet the requirement within Edinburgh. **No modification proposed.**

#### Southside Community Council (0781)

Addressing poverty and inequality are integrated within the plan. As set out within the four outcomes at paragraphs 2.4-2.35 the Plan addresses poverty and inequality in a number of ways. This includes aims to ensure that everyone has access to a range of amenities, a range of house types that are adaptable and affordable, access to green blue network, creating accessible places and supporting development that contributes to good growth including community and social enterprises.

The Plan has been set out to be user friendly and is organised into clear sections identified by colour coding. Page 4 sets out how to use the plan. While the document is lengthy this is necessitated by the scope of the content. **No modification proposed.**

Thomas Tierney (0400)

The City Plan Proposed Action Programme (CD008) sets out how the infrastructure and services required to support the growth of the city will be delivered. The long term impacts of the pandemic and Brexit are unknown. The policies of the Plan allow sufficient flexibility. The pandemic emphasised the benefits of local living and the 20-minute neighbourhood principle is embedded in the Plan policies. **No modification proposed.**

University of Edinburgh (0464)

Decisions on planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. Any flexibility is a matter for individual decision in accordance with this. **No modification proposed.**

William Moyes (0305)

The format of the document is addressed above. The Plan contains numerous references to other agencies and partnerships. Proposals tables set out in Part 2 of the Plan include references to funding and delivery. The Proposed City Plan Action Programme (CD008) sets out how the infrastructure and services required to support the growth of the city will be delivered. **No modification proposed.**

Wright PDL (0078)

Reference is made within paragraph 2.89 to the need for homes to support economic growth. It is not considered necessary to include any further statement of the economic and social benefits of housing. The Plan is supportive of housing development in appropriate locations. **No modification proposed.**

## **Aims**

Andrew Anderson (0535), Susie Ross (0440)

Paragraph 2.1 acknowledges that the Plan is ambitious and aims reflect this. **No modification proposed.**

Andy Inglis (0138)

Edinburgh's population is forecast to grow. The Plan is required to meet the housing needs to support this growth. The reference to "better active travel" at aim 1 is considered to be appropriate. This acknowledges that there is existing active travel infrastructure and the Plan aims to improve upon this. **No modification proposed.**

Anna Brand (0742)

The commitment in City Plan is to help deliver the Council's commitment to net-zero by 2030. This exceeds the targets set by the Climate Change (Emissions Reduction Targets)

(Scotland) Act 2019 (CD151) for Scotland to achieve net zero by 2045. **No modification proposed.**

Archie Clarke (0003)

Addressing inequality is integrated within the plan. As set out within the four outcomes at paragraphs 2.4-2.35 the Plan addresses inequality in a number of ways. This includes aims to ensure that everyone has access to a range of amenities, a range of house types that are adaptable, access to green blue network and creating accessible places. While car parking free or low parking developments are encouraged in the Plan it sets a requirement to meet accessible parking standards. Equality of access is appropriately addressed through individual proposals and the Edinburgh Design Guidance (CD047) provides detail on the need for Access Statements. **No modification proposed.**

AREAA (0358)

The aim of the Plan is to direct development to brownfield land. It would not be appropriate within the aims to set out exceptions to this. Policy Env 18 sets out circumstances where development in the green belt and countryside may be acceptable and policy Hou 4 sets out that where there is need for housing land due to shortfall in the maintenance of the 5-year housing land supply development in the green belt or countryside may be permitted subject to a number of criteria. **No modification proposed.**

Arnold Myers (0758), Jennifer Hess (0771)

The Plan directs development to brownfield land rather than greenfield land. Policies of the Plan protect open space. **No modification proposed.**

Bo Adams (0363)

Policy Inf 1 requires that key community facilities are walkable within a 20-minute return trip and where this is not met services are delivered. Key community facilities include local shops, doctors and dentist surgeries. **No modification proposed.**

Brian Tiplady (0641)

Aim 1 refers to mixed use sustainable communities linked by better active travel and public transport. It is considered that this provides equal emphasis to active travel and public transport. **No modification proposed.**

CBRE Global Investors (0644), Nuveen Real Estate (0564), Nuveen Real Estate (0734)

The text as worded refers to retail and leisure. It is not necessary to include reference to the wider hierarchy of centres. The hierarchy of centres is supported within the retail policies and paragraph 2.141-2.148. **No modification proposed.**

Cramond & Barnton Community Council (0243)

The purpose of this section of the Plan is to set out the aims of the plan. Aim 2 sets out that new development is directed to brownfield land. It would not be appropriate to set out the current use of sites within this section of the Plan or any requirement of assessment of

impacts on businesses. Impacts on business are addressed in the Council's response to issue 3 Delivery of the Strategy. **No modification proposed.**

Neither aim 1 or policy Inf 1 Community Facilities specify particular community facilities. This is appropriate as the individual circumstances will vary depending on the location of a proposed development and proposals will be considered on their individual merits taking into account various factors. The text set out in paragraph 3.195 gives examples of community facilities. **No modification proposed.**

The definition of brownfield is set out in the Glossary at page 198. The definition is land which has previously been developed. This includes developed land within the urban area. It is not necessary to set out within the aims the current use of any allocated sites. **No modification proposed.**

The Plan is seeking to deliver mixed use housing led development on all allocations. However, the Council acknowledges that there may be some businesses that have to relocate, particularly class 5 developments which are not appropriate in a residential environment and the Council has identified additional land (40.3ha) at Newbridge Industrial Estate in the form of an extension to the West. There is also 12ha of land still available within the existing Newbridge Industrial Estate that could accommodate relocating businesses. There is also existing Business and Industrial land identified at, Brunstane (8.6ha) and Seafield, Site EW1d (26 ha) that could potentially accommodate some relocated businesses. This gives a total of approximately 87ha of land for potential industrial relocation. As a result, the Council considers that the development plan has a mitigation strategy for the impacts on businesses that are unable to be retained within redeveloped sites and the suggested text is unnecessary. **No modification proposed.**

Douglas Tharby (0148), Melford Developments Ltd (0308)

All aims are equal and are not set out in order of priority. **No modification proposed.**

Dr David Houston (0655), Jay Chimo (0674).

Edinburgh's population is forecast to grow. The Plan is required to meet the housing needs to support this growth. **No modification proposed.**

Edinburgh Chamber of Commerce (0379)

It is not considered that the ability to provide a 20-minute neighbourhood is a threat to businesses. The Plan aims to deliver business space as part of mixed use housing development on allocated sites and sites within the urban area. Impacts on businesses is considered in the Council's response to Issue 3 Delivery of the Strategy. Housing sites have been identified through a process of site assessment set out in the Choices Housing Study, January 2020 (CD026). The identification of sites is addressed in Issue 20 Assessment of Housing Land Supply. The Plan identifies local centres which serve local retail function and policy protects the retail function of these centres. Policy Inf 1 requires that key community facilities are walkable within a 20-minute return trip and where this is not met services are delivered. Transport strategy is considered in the Council's response to Issue 31 Transport Strategy. **No modification proposed.**

Edinburgh Napier University (0731)



Aim 1 refers to active travel which includes wheeling and cycling. It is not necessary to identify wheeling and cycling separately. **No modification proposed.**

Edinburgh World Heritage (0339)

An additional aim to conserve and enhance the heritage of the city is not necessary. This is sufficiently addressed within the Plan policies. **No modification proposed.**

Policy Env 7 addressed embodied carbon. It is not necessary to refer to the policy within the aims. **No modification proposed.**

Frances Guy (0589)

Neither aim 1 or Policy Inf 1 Community Facilities specify particular community facilities. This is appropriate as the individual circumstances will vary depending on the location of a proposed development and proposals will be considered on their individual merits taking into account various factors. The text set out in paragraph 3.195 gives examples of community facilities. **No modification proposed.**

The Plan sets out policies to be applied to new development and change of use. It is not within the scope of the Plan to address retrofitting. **No modification proposed.**

Graeme Parry (0230)

The Plan is informed by an Education Appraisal (CD015), Healthcare Appraisal (CD016) and Transport Appraisal (CD014). These identify infrastructure requirements of planned development. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

The Plan was prepared in line with the Planning (Scotland) Act 2019 (CD102). This sets out that the purpose of planning is to manage the development and use of land in the long term public interest including development which contributes to sustainable development or achieves the national outcomes. The Plan outcomes reflect these national outcomes and paragraphs 2.37 to 2.148 set out how City Plan will contribute to achieving them.

The Plan had regard to emerging national spatial strategy and policies, as provided by the Scottish Government's Position Statement on NPF4 (CD098), draft NPF4 (CD099) and the Programme for Government 2021 (CD100) and by regional and local approaches through the interim Regional Spatial Strategy (CD093) (approved by the SESplan Joint Committee, City Region Deal Joint Committee and ratified by the constituent authorities) and the emerging Wider West Edinburgh Spatial Strategy, all relevant considerations for an emerging Local Development Plan in terms of the Act.

Spatial strategy is addressed at Issue 2, impacts on business is addressed at Issue 3, housing supply targets and land requirement is addressed at Issue 19, consultation and the approach to West Edinburgh are addressed at Issue 39. **No modification proposed.**

Paragraph 2.1 refers to future growth. This is all encompassing and includes economic growth. **No modification proposed.**

All aims are equal and are not set out in order of priority. **No modification proposed.**

Aim 2 reflects the spatial strategy. This is considered in the Council's response to Issue 2 Spatial Strategy. Sufficient land has been allocated in line with the spatial strategy and this is addressed in the Council's response to Issue 20 Assessment of Housing Land Supply. It is not necessary to refer to the extension of communities. **No modification proposed.**

Policy Env 8 New Sustainable Building set out the requirements for net-zero. This is addressed in the Council's response to Issue 13 Sustainable Design. **No modification proposed.**

The green setting of the city is not limited to the effect of countryside and green belt therefore it is appropriate to keep the text as worded to refer the green setting of the city in general. **No modification proposed.**

Housing need and demand is addressed in the Council's response to Issue 19 Housing Supply Target and Land Requirements **No modification proposed.**

The strategy, as set out in aim 2 of the Plan, to direct new development to and maximise the use of brownfield land through housing led mixed use development will deliver space for businesses supporting aim 10 to deliver the key economic land uses. The reference to modern business space as part of housing-led mixed use development should therefore be retained. **No modification proposed.**

Homes for Scotland (0404), Steve Loomes (0767)

The Council does not consider that aims of the Plan are contradictory. City Plan aims to ensure that the planning of housing, employment and services addresses the need for net-zero development, resilience to climate change, quality places and green spaces, delivery of community infrastructure and job opportunities where people live and embeds a 20-minute neighbourhood principle at the heart of all places in Edinburgh. **No modification proposed.**

John Bremner (0140)

Edinburgh's population is forecast to grow. The Plan is required to meet the housing needs to support this growth. **No modification proposed.**

The Plan directs new development to brownfield land. Policy Hou 1 supports housing development on the allocated sites and other suitable sites within the urban area. Policy Env 18 supports development in the green belt and countryside only in exceptions circumstances. **No modification proposed.**

Aim 6 sets out the aim to deliver land to meet housing needs. Aim 2 sets out the locations for this. The aims are interrelated, and therefore it is not necessary to refer to locations for housing development within aim 6. While the Plan aims to deliver housing on the allocated sites and other suitable sites in the urban area policy Hou 4 Housing Land Supply allows for greenfield development in circumstances where there is a shortfall in the maintenance of the 5-year housing land supply. This is in line with Scottish Planning Policy. The suggestion that aim 6 refer to limiting development to brownfield only would therefore be incorrect. **No modification proposed.**

It is suggested that as roads are at their limit of width the infrastructure first approach should be removed. The infrastructure first approach directs development to where there is existing infrastructure. Proposals are identified in the Plan to provide infrastructure required to support development. Policy Inf 3 supports development where there is sufficient infrastructure capacity already being available or can be delivered at the appropriate time to mitigate any negative impacts. **No modification proposed.**

Policy Env 26 addresses housing density. It promotes an appropriate density of development taking account of site characteristics and location. It highlights the benefits of high density. Densities for allocated sites are set out in Part 4, Table 2. **No modification proposed.**

Policy Hou 7 Loss of Housing addresses the use of dwellings for short-term lets. This presumes against the change of use of dwellings to short-term letting. **No modification proposed.**

#### Juniper Green & Baberton Mains Community Council (0306)

Aims are considered to be set out in sufficient detail. Further detail on the aims is set out in paragraph 2.37- 2.148. **No modification proposed.**

Paragraph 3.195 sets out facilities which are necessary to foster community life and reduce the need to travel for everyday services. **No modification proposed.**

There may be potential for existing areas to benefit from the provision of community facilities in association with new development however the Plan can only provide policies against which to assess development proposals. **No modification proposed.**

A glossary of terms is provided at page 158. Where acronyms have been used the full terms are set out within the associated text. **No modification proposed.**

Policy Env 7 requires that a sustainability statement is provided for new developments setting out how the development has been designed to allow future adaptation to different uses. Where is proposed to replace a building, proposals must be accompanied by a carbon assessment which provides a comparative assessment to the option of re-using the building. The issues raised in the representation are therefore addressed in the policies of the Plan and it is not considered necessary to refer to these within the aims. **No modification proposed.**

The Plan directs new development to brownfield land. Policy Hou 1 supports housing development on the allocated sites and other suitable sites within the urban area. Policy Env 18 supports development in the green belt and countryside only in exceptions circumstances. **No modification proposed.**

The Plan identifies education infrastructure required to support development. Education proposals are set out in Part 2, Table 11 and cost estimates are set out in the Action Programme. The Plan does not contain a proposal for Currie Community High School. **No modification proposed.**

#### Leith Harbour and Newhaven Community Council (0776)

The Plan aims to provide a mix of house types to provide for multi-generational communities. There are many examples in Edinburgh of development both historic and new which are high density but also provide for a range of housing needs. There are many benefits to high density including the maintenance of local services which contribute to 20-minute neighbourhoods and public transport making the area suitable for a range of ages. **No modification proposed.**

Reference to local place plans is made at paragraph 2.12. It is not the role of the Plan to set out legislative progress. **No modification proposed.**

Lynn Grattage (0362)

The spatial strategy of the Plan directs new development to, and maximises the use of, brownfield land rather than greenfield land and is in accordance with SPP 2014 (CD096) paragraph 40. The spatial strategy of the Plan directs new development to, and maximises the use of, brownfield land rather than greenfield land and is in accordance with SPP 2014 (CD096) paragraph 40. The emerging national policy provided by draft NPF4 (CD099) sets an overarching principle for compact growth limiting urban expansion where brownfield land and buildings can be used more efficiently. Spatial Strategy is addressed in the Council's response to Issue 2 Spatial Strategy. **No modification proposed.**

Michael Ramsay (0011)

Aim 4 refers to the requirement for all new buildings to be net zero and the support of the Plan to the delivery of heat networks and infrastructure development including in heritage buildings. Environment policies of plan protect the cities heritage. **No modification proposed.**

Murray Estates (0197), Stewart Milne Homes (0118)

City Plan does not have a strategy of reallocating active business/industrial sites and allocated employment land to housing uses. The part of the strategy of the Plan is to promote the redevelopment of existing brownfield sites, of which only a proportion are in industrial use, for mixed use housing led development. The Council's response to displacement of business and economic strategy is dealt with under issue 3 Delivery of the Strategy. It is not necessary to change Aim 10 as suggested. **No modification proposed.**

Nicola McCowan Hill (0195)

The Council consider that the policies and proposals identified in the Plan will deliver the strategy. Paragraphs 2.37-2.148 set out how the Plan will meet the outcomes set out at paragraph 2.36. **No modification proposed.**

Patricia Willder (0205)

The Plan directs new development to brownfield land. Policy Hou 1 supports housing development on the allocated sites and other suitable sites within the urban area. Policy Env 18 supports development in the green belt and countryside only in exceptions circumstances. **No modification proposed.**

Robert Falcon (0640)

The Plan directs new development to brownfield land. Policy Hou 1 supports housing development on the allocated sites and other suitable sites within the urban area. Policy Env 18 supports development in the green belt and countryside only in exceptional circumstances. West Edinburgh development is addressed in the Council's Response to issue 6 proposed Sites West Edinburgh. **No modification proposed.**

RSPB Scotland (0648), Sarah Adamson (0523)

City Plan policies, supplementary planning guidance and the Edinburgh Biodiversity Action Plan (CD068) recognise the value and potential for biodiversity outwith designated areas and sets out key principles for connecting and enhancing biodiversity through habitat creation and restoration. The Plan contains proposals to link and expand the city's green and blue network which will help to reverse the decline in biodiversity. The value of brownfield sites is recognised in Place Policies. Policy Env 21 requires that features of biodiversity value should be safeguarded and enhanced. It is therefore considered that sufficient protection is provided for biodiversity where proposals come forward on brownfield sites. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The representation acknowledges that no changes are required at this stage given that the proposed plan meets its aims by directing new development to, and maximising the use of, brownfield land rather than greenfield land, in accordance with SPP Para 40 (CD096). Draft NPF4 (CD099) proposes under Policy 30: Vacant and Derelict Land that "Local development plans should seek to reuse vacant and derelict land and redundant buildings as a priority including in proposals to creatively and sustainably repurpose buildings and structures." In identifying sites to deliver housing land an assessment of urban brownfield land was undertaken. The methodology for this is set out in the City Plan 2030 Housing Study, January 2020 (CD026). The Scottish Vacant and Derelict Land Survey (CD123) was used as a data source. Where such sites were identified as having potential for housing development they were taken forward for further assessment. It is therefore considered that the Plan has sought to reuse vacant and derelict land as a priority prior to seeking further land for housing development. **No modification proposed.**

Shortbread House (0619)

Brownfield sites allocated in City Plan are within the general urban area. They are not allocated as employment land within the current development plan. 64% of allocated brownfield sites have operational businesses. City Plan aims to deliver mixed use communities. Policy Econ 5 Employment Sites and Premises requires that redevelopment of employment sites of all sizes includes floorspace designed to provide for a range of business and commercial users. This will retain and include small business commercial units within mixed use developments. Displacement, relocation and the need for employment land are dealt with under Issue 3 Delivery of the Strategy. **No modification proposed.**

Southside Community Council (0781)

Aim 2 sets out that development will be directed to and maximise the use of brownfield land rather than greenfield land. This is considered to be a strong statement and there is no requirement to strengthen this. **No modification proposed.**

The 20-minute neighbourhood principle is embedded in the Plan policies. These provide the detail of implementation. It is not necessary to set this out within the aims. **No modification proposed.**

The Royal London Mutual Insurance Society Ltd (0149)

Aim 10 addresses the delivery of key economic land uses. The aims are interrelated. It is not necessary to refer to the needs of business and industry within Aim 2. Adequate provision is made for economic land use and this is addressed in the Council's response to Issue 3 Delivery of the Strategy. **No modification proposed.**

The Plan aims to deliver business space as part of mixed-use housing development on allocated sites and sites within the urban area. Policies in the Plan support businesses development on identified business and industry sites and for employment purposes in the urban area. The aim is to provide this as part of a mix of uses and Policy Econ 2 requires that commercial developments over 0.25ha provide at least 50% of the site for housing. The text as set out in Aim 10 reflects this approach. **No modification proposed.**

### **National strategies**

Andy Inglis (0138)

Reversing and preventing loss of biodiversity are integral to the plan. Specifically paragraphs 2.71 -2.74 and policies Env 21 Protection of Biodiversity and Env 37 Designing-in Positive effects for Biodiversity require consideration of biodiversity. The city's growth is not a metric for success of City Plan. Paragraph 2.36 sets the outcomes for City Plan. **No modification proposed.**

Archie Clark (0003)

Proposals are identified in Part 2, Table 1 for new allotments/ and or food growing areas. **No modification proposed.**

Policy Env 6 requires that proposals for new buildings are accompanied by a surface water management plan. The Vision for Water Management in the City of Edinburgh (CD152), referenced in paragraph 2.31 of the plan, sets out key principles of how the city should manage its water environment. **No modification proposed.**

Cockburn Association (0777)

Paragraphs 2.282.30 set out how City Plan can contribute towards a net zero city. **No modification proposed.**

Edinburgh World Heritage (0339)

Scottish Government's policies on alteration or change in the historic environment are set out in Scottish Planning Policy (CD096) and this is identified at paragraph 2.19. The Historic Environment Policy for Scotland sets out how to approach decisions in the planning system affecting the historic environment and is referenced in the Council's

Edinburgh Design Guidance (CD047). It is not considered necessary to refer to this specific policy within the plan. **No modification proposed.**

The purpose of the section at page 11 titled “How does the City Plan strategy work with national, regional and Council strategies? is to set out the key policy frameworks and council programmes. It is not its purpose to specify legislation. Paragraph 3.103 refers to The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (CD107) as a statutory consideration in the assessment of applications. **No modification proposed.**

Planning policy drivers are set out at paragraphs 2.27 – 2.35 based around the Council’s three main areas of change- becoming a sustainable and net zero city, ending poverty by 2030 and delivering wellbeing and equalities. It is not appropriate to refer to the World Heritage Site Management Plan within these areas of change. Reference to the World Heritage Site Management Plan is made at paragraph 2.48. **No modification proposed.**

#### Grange/Prestonfield Community Council (0192)

The Plan has been prepared in the context of SPP 2014 (CD096) and NPF3 (CD097), however in line with the Town and Country Planning (Scotland) Act (1997) Act (CD101) section 16 2 (c) the Council has considered emerging policy and strategy where this is relevant in preparation of the Plan, particularly where this is more recent. This has included Fourth National Planning Framework: position statement (2020) and other emerging work at national, regional and local level in preparation of the proposed plan. This approach is supported by the representation from the Scottish Government (0309). **No modification proposed.**

#### Hallam Land Management (0615), Tarmac (0244)

The level of detail provided at paragraph 2.5 in relation to the Planning Act is considered to be sufficient. It sets out the purpose of planning. **No modification proposed.**

Paragraph 2.14 refers to the NPF4 Position Statement. Since the publication of the proposed plan a draft NPF4 has been published. The Council acknowledges this reference is now dated and this should be corrected as a minor drafting/technical matter.

NPF4 has been published in draft form (CD099) and is yet to be finalised. It would therefore not be appropriate to include the minimum housing land figures provided in the draft NPF4. **No modification proposed.**

Since the publication of the proposed plan the Final (Draft) report of STPR2 has been published. It was subject to consultation in early 2022. The Council acknowledges this reference is now dated and this should be corrected as a minor drafting/technical matter.

Paragraph 2.18 provides set out the two main policies covering sustainability and placemaking. It provides a list of subject policies. It is not necessary to restate the entire contents of SPP. **No modification proposed.**

The Plan has been prepared in the context of SPP 2014 (CD096), NPF3 (CD097), however in line with the Town and Country Planning (Scotland) Act (1997) Act (CD101)) section 16 2 (c) the Council has considered emerging policy and strategy where this is relevant in preparation of the Plan, particularly where this is more recent. This has

included Fourth National Planning Framework: position statement (2020) (CD098) and other emerging work at national, regional and local level in preparation of the proposed plan. This approach is supported by the representation from the Scottish Government (0309). **No modification proposed.**

Delivery of the strategy is addressed in the Council's response to Issue 3, the approach to West Edinburgh is addressed in Issue 6 and issues related to consultation are addressed in Issue 39.

Leith Harbour and Newhaven Community Council (0776)

Paragraph 2.18 is factually correct as worded. As set out on p3 of SPP 2014 (CD096) where 'must' is used it reflects a legislative requirement to take action and where 'should' is used it reflects Scottish Ministers' expectations of an efficient and effective planning system. **No modification proposed.**

Paragraph 2.33 is factually correct as worded. The City Housing Strategy sets priorities and does not enforce them. **No modification proposed.**

Leith Links Community Council (0617)

The long term impacts of the pandemic are unknown. The policies of the Plan allow sufficient flexibility. The pandemic emphasised the benefits of local living and the 20-minute neighbourhood principle is embedded in the Plan policies. **No modification proposed.**

Design policies are set out in the Plan which promote a high standard of design and further guidance is provided in the Council's Edinburgh Design Guidance (CD047) and suite of non-statutory planning guidance. **No modification proposed.**

Melford Developments Ltd (0308)

It is not agreed that the Plan does not align with the Planning Act, SPP 2014 (CD096) or the Edinburgh Economy Strategy (CD063). The Plan has been prepared in line with the Planning (Scotland) Act 2019 (CD102). This sets out that the purpose of planning is to manage the development and use of land in the long term public interest including development which contributes to sustainable development or achieves the national outcomes. The Plan outcomes reflect these national outcomes and paragraphs 2.37 to 2.148 set out how City Plan will contribute to achieving them.

The Plan reflects the Council's economy strategy which seeks sustainable growth. City Plan supports existing businesses, continues to promote previously identified economic proposals and highlights new investment opportunities. The Plan provides for key land use needs and supports development where there is contribution to good growth for Edinburgh.

As required by SPP 2014 (CD096) the Plan allocates sufficient land to meet the housing land requirement and the Council's response to this is set out in Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

NHS Lothian (0596)



Paragraph 2.35 refers to the Improvement Service and Public Health Scotland's document Place and Wellbeing which places emphasis on the role of Local Development Plans working in partnership with public health practitioners. **No modification proposed.**

Robyn Kane (0091)

Addressing poverty and inequality are integrated within the plan. As set out within the four outcomes at paragraphs 2.4-2.35 the Plan addresses poverty and inequality in a number of ways. This includes aims to ensure that everyone has access to a range of amenities, a range of house types that are adaptable and affordable, access to green blue network, creating accessible places and supporting development that contributes to good growth including community and social enterprises. **No modification proposed.**

Roger Thomas (0345)

Strategic enhancement of Edinburgh Airport is a national development identified in NPF3 (CD097). While draft NPF4 (CD099) does not continue the national development designation, until the adoption of NPF4 it is considered appropriate to include this reference to the adopted NPF3 as part of the current national strategy context. **No modification proposed.**

The reference at 2.17 is to the sustainable transport hierarchy. Flying does not feature in this hierarchy. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The representation suggests that consideration is given to the draft NPF4 (CD099) and the emerging position in relation to national developments. Paragraph 2.11 of the Plan refers to the national developments identified in NPF3 (CD097) that are particularly relevant to Edinburgh. This includes the strategic enhancement of Edinburgh Airport and the Central Scotland Green Network. The Council note the shift in policy direction over national developments and note that Edinburgh Waterfront; Urban Sustainable Blue and Green Drainage Solutions; National Cycling and Wheeling Network and continuation of the Central Scotland Green Network as national developments. While draft NPF4 does not continue the national development designation of strategic enhancement of Edinburgh Airport, until the adoption of NPF4 it is considered appropriate to include this reference to the adopted NPF3 as part of the current national context. The outcomes and policy direction of the Plan reflect this policy shift. The representation acknowledges that no changes are required at this stage. **No modification proposed.**

To provide a stronger link with economic development it is suggested that a reference to City Deal is included within the plan. Within paragraphs 2.22- 2.26 which set out the regional context there are references to City Deal. This makes reference to the Interim Regional Spatial Strategy which has been influenced by City Deal and also to the City Region Deal funding for West Edinburgh Transport Appraisal and West Edinburgh Transport Improvement projects to address cross boundary transport issues in the West of Edinburgh. The Council consider that the link is already contained within the Plan as worded. **No modification proposed.**

The representation suggests that reference is made to the National Marine Plan, Regional Marine Plan, Scottish Government's Heat in Buildings Strategy, and the Heat Network

delivery targets in section 92 of the Heat Networks (Scotland) Act 2021. No modification proposed however should the Reporter see merit in including reference to these plans and strategies the Council would accept this. **No modification proposed.**

#### SEPA (0012)

The Council acknowledge that paragraph 2.7 incorrectly refers to the Climate Change (Scotland) Act 2019 in relation to reduction in emissions. This is technical error and should be corrected as a minor drafting/technical matter. **No modification proposed.**

#### Southside Community Council (0781)

Paragraph 2.4- 2.35 sets out how the City Plan strategy works with national, regional and council strategies. This sets the current context in relation to finalised strategies. It also includes the emerging NPF4. Paragraphs 2.37-2.148 set out further details of the outcomes of the Plan and make reference to the key policy frameworks and council programmes and how city plan will address these. **No modification proposed.**

#### **Outcomes – General**

#### Cramond & Barnton Community Council (0243)

The four outcomes set out at 2.36 include a sustainable city. The outcome as set out is considered to be appropriate as it encompasses a range of issues within the heading of sustainability, it would not be appropriate to list every aspect contributing to this and paragraphs 2.37-2.87 sets out more detail on this outcome which addresses natural and built heritage and climate change and adaptation. **No modification proposed.**

#### Grange/Prestonfield Community Council (0192)

The use of the words “we want Edinburgh” to be is considered appropriate in this context in setting out a vision for Edinburgh in 2030. Paragraphs 2.37- 2.148 set out how the Plan will achieve these outcomes. **No modification proposed.**

#### **A sustainable city which supports everyone’s physical and mental wellbeing**

#### Alexander Sutherland (0193), Jean Morley (0461)

The Plan directs new development to brownfield land. Policy Hou 1 supports housing development on the allocated sites and other suitable sites within the urban area. The green belt and countryside are identified on the proposals map. Policy Env 18 supports development in the green belt and countryside only in exceptions circumstances. **No modification proposed.**

#### Andrew Heald (0566)

Edinburgh’s Trees in the City Action Plan, January 2014 (CD069) sets out policies that will inform how the Council manages trees and woodlands in its own ownership. Policy 20 referred to in the representation states that the Council will ensure that all construction and development, including temporary installations and placement of movable equipment, near to trees follows BS:5837 (2012) and “Guidelines for the planning, installation and maintenance of utility apparatus in proximity to trees” are followed where carrying out

works in root protection areas cannot be avoided. The Action Plan does not set policies in relation to planning or development control but deals with management therefore it is not accepted that reference needs to be made to this document within the plan. **No modification proposed.**

Policy Env 20 requires that a tree survey, that is accepted as competent by the Council, is provided for proposals that may adversely affect trees. It is not considered appropriate to limit this to one type of survey. The Council's process for decision making in planning applications in accordance with the Planning Act follows the recognised process set out in British Standard 5837 (2012) – Trees in Relation to Design, Demolition and Construction, alongside ecological appraisal. Where necessary, further impact statements or intrusive investigation will be requested in order to reach an informed decision on the amenity and biodiversity value of trees and woodland. Any change to the British Standards will be reflected in updates to guidance. **No modification proposed.**

The Million Tree Project was planned before the potential impact of ash dieback was assessed. There are an estimated 730,000 trees in the city, of which almost 44,000 are ash. It is not accurate to say that all ash trees will be lost by 2030. Estimates vary, but it is expected that 70-90% of ash trees will be lost and it may take longer than eight years to reach that point. An updated authority-wide tree survey is planned as part of the Million Tree City programme, which will capture currently unavailable data and provide more detailed estimates of tree numbers, species and distribution. As the reference at 2.70 is to the Million Tree Project and there has been no reassessment of the number of trees required considered appropriate to retain paragraph 2.70 as worded. **No modification proposed.**

#### Archie Clark (0003)

Paragraph 3.86 sets out the expectation for masterplans. Place policies set development principles for sites which provide the context for the preparation of masterplans. The Edinburgh Design Guidance sets out their expectations for masterplans. It is not the role of the Council to prepare masterplans in every situation. **No modification proposed.**

The purpose of paragraphs 2.58-2.60 is to set out the objectives of the green belt. The text reflects the purpose as set out in Scottish Planning Policy. **No modification proposed.**

Low Emissions zones are not within the scope of the development plan. **No modification proposed.**

To meet the Council's citywide target to reduce car kilometres by 30% by 2030 measures are required to increase the use of modes other than private car. Parking standards help by setting maximum limits for general car parking to restrict excessive provision, while setting minimum levels for accessible car parking, cycle parking, motorcycle parking and electric vehicles. Parking standards are set out in the Edinburgh Design Guidance (CD047) and not within the plan. Mode shift is addressed in Issue 31 Transport Strategy. **No modification proposed.**

#### Cockburn Association (0777)

Material considerations can only be determined in the context of each case. It is therefore appropriate to retain the wording “may be a material consideration”. **No medication proposed.**

Policies of the Plan protect and enhance heritage assets. Policy Env 3 requires enhancement of existing features, Paragraphs 3.103-3.123 set out policies to protect and enhance historic assets. These policies contribute to the outcome set out at paragraph 2.36 for Edinburgh to be a sustainable city which supports everyone’s physical and mental wellbeing. **No modification proposed.**

Plan policies can only be applied to proposals for development within the scope of the Planning Act. Policies cannot be applied to other regulatory regimes. **No modification proposed.**

Open space is protected by Policy Env 23. Open Space is identified on the proposals map. This includes private green spaces such as gardens. **No modification proposed.**

#### Cramond & Barnton Community Council (0243)

The outcome as worded is considered to be appropriate. Net zero extends across all outcomes. Reference to both physical and mental wellbeing are important. Maintenance of the built and natural heritage are captured but ‘sustainable’ city. **No modification proposed.**

#### Edinburgh World Heritage (0339)

The Council acknowledge that the historic environment makes a contribution to social, environmental and economic health. The first sentence of paragraph 2.45 states that Edinburgh’s built environment contributes to its distinctive character, local appeal and world-wide reputation. This is considered to express the same sentiment as the proposed addition. **No modification proposed.**

Paragraph 2.62 sets out the benefits of blue/green infrastructure. Protection of heritage assets is suitably referenced in paragraphs 2.45-2.56. **No modification proposed.**

#### Grange/Prestonfield Community Council (0192)

The Plan directs new development to brownfield land. Policy Hou 1 supports housing development on the allocated sites and other suitable sites within the urban area. The green belt and countryside are identified on the proposal map. Policy Env 18 supports development in the green belt and countryside only in exceptional circumstances. **No modification proposed.**

#### Homes for Scotland (0404), Steve Loomes (0767)

The Council does not agree that the policies of the Plan contradict with the aims. Higher density development is promoted subject to ensuring new development has a positive impact on the urban design of its location. Higher density development makes efficient use of land, helps maintain or create viability of services, encourages effective provision of public transport and is in line with sustainability aims. **No modification proposed.**

The Plan contains policy which addresses built heritage and new development. Policy Inf 1 supports housing development where key community facilities are walkable within a 20 minute round trip. There are many community facilities located within conservation areas and policies of the Plan protect these areas while allowing for appropriate development. **No modification proposed.**

Sufficient land has been identified to meet the housing land requirement and this issue is addressed in Issue 20 Assessment of Housing Land Supply. Green belt policy is addressed under Issue 15 Natural Environment Policies. **No modification proposed.**

Policy Env 26 addresses housing density. It promotes an appropriate density of development taking account of site characteristics and location. The Council considers requirements for open space and provision of green blue network to be compatible with density requirements. Appendix 1 of the City Plan Housing Study (CD026) provides illustrations of how green blue infrastructure and greenspace/open space can be provided at different density scales. City Plan has policies which protect amenity and ensure noise levels are acceptable for future and existing residents alike. **No modification proposed.**

Jennifer Inglis (0437)

Policy Env 7 Sustainable Developments requires that a sustainability statement is submitted that addresses construction materials and life-long construction. It requires that construction materials have low or negative embodied greenhouse gas emissions and are local and/or sustainably sourced and/or recycled and capable of re-use at the end of a building's lifecycle. Policy Env 20 presumes against development that risks having a damaging impact on any tree. Policy 23 protects open space. It is therefore considered that the suggested inclusion is already contained within the policies of the plan. **No modification proposed.**

John Torrance Glencross (0509), Oliver Glencross (0489)

It is acknowledged that Cramond is inadequately served by the large standard open space in line with standards set out in the Council's Open Space Strategy (CD066). The Plan identified a proposal BGN26 at Cramond Road. The site is currently open-space however it has scope for improvement to provide greater amenity for the surrounding area. The site should deliver a minimum of 2 hectare area of good quality open space which is publicly accessible. The proposal is identified in Part 2, Table 1 **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306)

Paragraph 3.86 sets out the expectation for masterplans. Place policies set development principles for sites which provide the context for the preparation of masterplans. The Edinburgh Design Guidance (CD047) sets out their expectations for masterplans. It is not the role of the Council to prepare masterplans in every situation. **No modification proposed.**

The Plan sets out the requirement for place briefs. The detail of the process does not require to be set out in the plan. **No modification proposed.**

The Plan directs development to brownfield land and sites within the urban area. **No modification proposed.**

Leith Central Community Council (0614)

A Strategic Flood Risk Assessment (SFRA) (CD011) was undertaken to inform and support the development of the City Plan and its spatial strategy. The SFRA assessed possible City Plan development sites with their level of flood risk holistically considering different forms of flooding, such as Coastal, Fluvial and Pluvial, as well as factoring in related considerations such as erosion. This is referred to in paragraph 2.80 of the plan. **No modification proposed.**

Paragraph 2.45-2.46 refers to the built form and how this contributes to the city's distinctive character. It is not necessary to refer to individual elements of the city's heritage. **No modification proposed.**

Leith Harbour and Newhaven Community Council (0776)

The suggested strengthening of paragraph 2.42 by replacing the words 'should' and 'can' with 'will' is not accepted. The use of the word 'will' predicts an outcome **No modification proposed.**

Paragraph 2.46 is a general statement about Edinburgh, and it is not appropriate to identify particular areas of the city. **No modification proposed.**

Paragraph 2.49-2.50 relate to listed buildings and conservation areas. Policies Env 10 and Env 13 address demolition. Policy presumes against demolition of a listed building and demolition within a conservation area is only permitted in exceptional circumstances and it must be demonstrated that all option to retain the building have been fully explored. **No modification proposed.**

Paragraph 2.57 is a general statement about the natural environment, and it would not be appropriate to refer to such detailed matters as suggested in the representation. Policy Env 20 protects existing trees. Hard standing is addressed in the Edinburgh Design Guidance. **No modification proposed.**

There is no contradiction between paragraphs 2.68-2.70 and paragraph 3.130. Paragraph 2.68 refers to legislation which protects specific trees and paragraph 3.130 refers to the Plan policy which applies to all trees. **No modification proposed.**

Liz Glass (0645)

Policy Env 27 sets policy for new planting. It requires that design follows the principles in the Council's Edinburgh Design Guidance (CD047), Edinburgh Biodiversity Action Plan (CD068) and other appropriate guidance. The types of species are best determined through application of this guidance. **No modification proposed.**

Mark Ockendon (0419)

Policy Env 30 sets out criteria to be met for development which rises above the building height prevailing generally in the surrounding area. **No modification proposed.**

Melford Developments Ltd (0308)

The Plan aims to deliver a network of 20-minute walkable neighbourhoods and create mixed use neighbourhoods. It supports business use in town and local centres. The Plan therefore aims to ensure that employment opportunities are available as part of a mix of uses including residential. **No modification proposed.**

Mr John G. Skinner (0065)

Policy Env 26 aims to promote an appropriate density of housing development and recognises at paragraph 3.142 that where appropriate increasing density and building heights can enhance an area's character and lead to better placemaking. Policy Env 30 sets out criteria to be met for development which rises above the building height prevailing generally in the surrounding area. Key views are specifically addressed within development principles for some sites set out in the plan. **No modification proposed.**

NatureScot (0528)

Paragraphs 2.58-2.60 provides the objectives of the green belt as set out in SPP (CD096). Draft NPF4 (CD099) continues this approach. It is acknowledged that draft NPF4 (CD099) sets out a wider range of uses which could be supported in the green belt than those set out in SPP. Acceptable uses within the green belt and countryside are set out at Env 18. This policy is addressed in Issue 15 Natural Environment. **No modification proposed.**

The text at paragraph 2.79 is considered to be correct. The work on dynamic coast is being undertaken by Glasgow University and SEPA. **No modification proposed.**

Ratho and District Community Council (0289)

The Council acknowledge that achieving a net zero city by 2030 is ambitious. The Council's 2030 Climate Strategy (CD064) leads on actions for change across Edinburgh by identifying what actions the city needs to take to improve resilience as well as achieve a reduction in greenhouse gas emissions by 2030. City Pan sets out policies which are designed to help deliver this commitment. **No modification proposed.**

Roger Thomas (0345)

Policy Env 14 Conservation Areas-Development criteria (c) requires that development within a conservation area utilises materials appropriate to the historic environment. Further detail is set out in the Council's Non-statutory Guidance for Listed Buildings and Conservations Areas (CD049). **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The Council is satisfied that the text at paragraph 2.52 is correct. No modification proposed, however, should the Reporter see merit in the representation to replace with the alternative text suggested the Council would have no issue with this change. **No modification proposed.**

Paragraph 3.121 and 3.122 sets out supporting text to archaeology policies Env 16 and Env 17. Paragraph 3.122 states that where a development may affect a scheduled monument or its setting, early contact should also be made with Historic Environment

Scotland. The Council consider that this provides sufficient signposting to the need to consult with Historic Environment Scotland. **No modification proposed.**

#### SEPA (0012)

It is suggested that text is added to refer to the importance of the local environment and in particular the role of green blue infrastructure in maximising place-led benefits. Paragraph 2.39 refers to the aim of City Plan to ensure that everyone has access to a range of amenities in their area through the promotion of 20-minute neighbourhoods. This includes the green blue network. **No modification proposed.**

#### Sport Scotland (0671)

Paragraph 2.37-2.44 set out the role of the Plan in improving the physical and mental wellbeing of residents. The suggestion that the contribution of physical activity to its outcome is therefore not appropriate to include within this section. **No modification proposed.**

Sports facilities are addressed within the Council's Open Space Strategy (CD066). It is not necessary to refer to the detail of this within the plan. **No modification proposed.**

The Council acknowledge that there is no definition within the Plan of outdoor sports facilities. A definition of sports areas is provided in PAN 65 (CD122). **No modification proposed.**

#### Stirling Developments (0303)

The housing policies, along with the other policies of the Plan aim to provide the required housing in mixed use sustainable communities. The Plan allocates housing sites within the urban area where there is a mix of uses including employment. Housing allocations are identified close to existing strategic business centres of West Edinburgh and Leith. **No modification proposed.**

Sustainable development is supported by the plan. Scottish Planning Policy (CD096) states that due weight is expected to be given in planning decisions to net economic benefit and this is a consideration for the decision maker through the development management process. **No modification proposed.**

#### The Association for the Protection of Rural Scotland (0334)

The Plan contains a policy, Env 28, which applies to all new development situated at the edge of the urban area. It supports development on sites at the green belt boundary where it conserves and enhances the landscape setting, promotes access to the surrounding countryside and includes landscape and environmental improvement that strengthen the green belt boundary. It is not necessary to refer to specific policies within paragraph 2.58. **No modification proposed.**

The purpose of paragraphs 2.58-2.60 is to set out the objectives of the green belt. It is not necessary to set out the contribution of the green belt to climate change. Paragraphs 2.62 recognises the multiple benefits of Edinburgh's green blue infrastructure, including the green belt, such as capturing carbon emissions, sustainably managing surface water and reducing flood risk. **No modification proposed.**



Paragraphs 2.68 -2.70 set out the legislation and strategies in relation to tree and woodland. Monitoring of trees is not within the scope of the development plan. **No modification proposed.**

University of Edinburgh (0464)

The importance of health and wellbeing is stressed throughout the plan. The strategy proposals and policies set out take a place-based approach to deliver greater equality in health and wellbeing through the delivery of 20-minute neighbourhoods. **No modification proposed.**

Wright PDL (0078)

The Council does not agree that the policies of the Plan contradict with the aims. Higher density development is promoted subject to ensuring new development has a positive impact on the urban design of its location. Higher density development makes efficient use of land, helps maintain viability of services, encourages effective provision of public transport and is in line with sustainability aims.

Policy Inf 1 supports development where key community facilities are walkable within a 20 minute trip. This supports the aim to ensure that everyone has access to a range of facilities through the promotion of 20 minute neighbourhoods. There may be potential for existing areas to benefit from the provision of community facilities in association with new development however the Plan can only provide policies against which to assess development proposals. As stated in the representation the Plan contains policies which protect amenity and ensure noise levels are acceptable for future and existing residents alike. **No modification proposed.**

**A city which everyone lives in a home they can afford**

Archie Clark (0003)

The proposed brownfield development sites identified within City Plan which currently have business uses on them are being promoted for mixed use housing led development and not just housing development, which is a fundamental part of the strategy. The Plan identifies infrastructure requirements of new development and supports housing development where key community facilities are walkable within a 20-minute return trip. **No modification proposed.**

David McGowan (0168)

City Plan aims to deliver a place based approach to growth. Policies are set out to protect residential amenity and to ensure that any community infrastructure required as a result of development is provided. **No modification proposed.**

The Davidson's Mains and Silverknowes Association (0454)

Policy Inf 3 supports the principle set out at paragraph 2.90. It requires that there is sufficient infrastructure either available or that it can be delivered at the appropriate time to mitigate negative impacts. **No modification proposed.**

Douglas Tharby (0148)

It is not necessary for terms to be quantifiable. Figures used to calculate the housing supply targets are addressed in Issue 19 Housing Supply Targets and Land Requirement. **No modification proposed.**

Edinburgh World Heritage (0339)

Paragraph 2.93 on page 26 states “There is strong potential for commercial centres, stand-alone supermarkets and other retail sites, to include housing as part of any future redevelopment and City Plan provides support for this.” Policy Hou 1 supports redevelopment of commercial centres to include residential. Housing as part of mixed-use development will be encouraged on appropriate sites to help meet housing need and create strong, sustainable communities. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

The representation suggests that the increase in affordable housing requirement to 35% on market sites should be monitored. The policy will be monitored, along with all policies of the Plan as part of future plan review. Any change to policy would require to be made through the development plan process. It is not necessary to refer to this within the plan. **No modification proposed.**

Kathryn Poolman (0574)

Alongside identified sites policy Hou 1 supports housing development in urban area which includes the city centre. Place 1 sets specific policy for the city centre. Place 1 (a) requires a mix of uses including residential. Policy Hou 7 presumes against the change of use of dwellings, including to use as a short-term let. The Plan therefore supports residential development in the city centre. **No modification proposed.**

NHS Lothian (0596)

The Plan has been informed by a Healthcare Appraisal (CD016) prepared by the Edinburgh Health and Social Care Partnership which identifies the requirement for healthcare resulting from housing allocations. Policy Inf 3 requires that where there is not sufficient infrastructure, including healthcare that this is provided. This issue is addressed in the Council’s response to Issue 27. **No modification proposed.**

Homes for Scotland (0404), Nicola McCowan Hill (0195), Simon Thomson (0248), Steve Loomes (0767), Wright PDL (0078)

Paragraph 2.2 sets out the aims of City Plan. The spatial strategy which directs new development to and maximises the use of brownfield land rather than greenfield land, is in accordance with SPP 2014 (CD096) paragraph 40 and the emerging national strategy of draft NPF4 (CD099) which has an overarching principle of compact growth, limiting urban expansion where brownfield can be used more efficiently. Spatial Strategy is addressed in the Council’s response to Issue 2 Spatial Strategy. Existing allocations and new proposals provide a range of sites, which are effective or expected to become effective in the Plan period, more than sufficient to ensure that should some sites not come forward for development as expected there will be adequate land to meet the housing land

requirement and maintain a five year effective supply. The overall housing land supply identified in the Plan provides a range of sites. 40% is greenfield and 60% brownfield. It is considered that the Plan provides a generous supply of housing land on a range of sites across the city and it is not necessary to allocate further sites. Housing Land Supply is dealt with under Issue 20 Assessment of Housing Land Supply. Policy Hou 4 provides for circumstances where a shortfall in the maintenance of the 5-year housing land supply is identified. It is dealt with under Issue 21 Housing Land Supply Policy. Impacts on business are addressed in the Council's response to issue 3 Delivery of the Strategy **No modification proposed.**

The Plan is supported by an Education Appraisal (CD015) which is an assessment of the infrastructure required to mitigate growth arising from additional pupils from new housing developments. Per unit rates will be set out in non-statutory guidance and reviewed and updated as part of annual reporting of the LDP Action Programme. **No modification proposed.**

Peter Allen (0336)

Paragraph 2.91 states that design should be at the heart of any new housing development. It is suggested that further detail should be provided on how this will be enforced. The design policies of the Plan set out requirements for design of development including amenity. In particular policy Env 1 Design Quality and Context does not support poor quality design. **No modification proposed.**

Roger Thomas (0345)

Paragraph 2.94 as worded contains reference to short-term letting. The presumption against loss of dwellings which is set out in Policy Hou 7 Loss of Housing applies to changes of use from a dwelling. A second home would not involve a change of use. **No modification proposed.**

Simon Thomson (0248)

Reference at 2.101 is to the Council commitment to developing a programme to build 20,000 homes by 2027 and should therefore remain. Housing supply targets and land requirement are addressed in the Council's response to Issue 19. Paragraph 2.109 refers to sites located partly or wholly in the green belt or countryside delivering a density of at least 65 dwellings per hectare. This is required in order to make the most efficient use of land, achieve 20 minute neighbourhoods and build sustainable communities which support local facilities and public transport. Density is addressed in the Council's response at Issue 12. **No modification proposed.**

Tessa Haring (0112)

Paragraph 2.94 refers to the number of properties being used for short-term letting. Policy Hou 7 Loss of Housing presumes against change of use from a dwelling to other uses including short-term letting. **No modification proposed.**

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

David McGowan (0168), John Martin (0008)

The policies of the Plan support the City Mobility Plan's (CD062) ambition to shift car trips to more sustainable modes in line with the sustainable transport hierarchy. This prioritises walking, wheeling and cycling. The Plan identifies active travel proposals and transport infrastructure required to support development. **No modification proposed.**

Douglas Tharby (0148)

City Plan 2030 is planning for a city in which you don't need to own a car to move around. Policies aim to reduce the need to travel and promote the shift from private car use to sustainable travel modes. Walking, wheeling and cycling are prioritised. As set out in paragraph 2.115 this is intended to ensure that these are a first choice over the use of a private car. This acknowledges that there will continue to be an element of private car use. **No modification proposed.**

Leith Links Community Council (0617)

Policy Inf 22 requires adequate water supply or foul waste water sewerage availability to meet the demands of the development. **No modification proposed.**

Policies of the Plan prioritise walking, wheeling and cycling. Active travel routes should meet the Council's Edinburgh Design Guidance (CD047) and street design guidance which has specific information in relation to cycle lanes, segregated cycle lanes and footways. The City Centre Transformations delivery plan (CD061) includes improved access for all through measures such as dropped kerbs, widened footways, improved surfacing and disabled parking. Policy Inf 7 requires that private car parking meets standards for accessible parking. Park and Ride facilities are addressed at Issue 32. Policy Inf 12 provides support for proposals for new park and ride facilities. **No modification proposed.**

Melford Developments Ltd (0308)

On 11 November 2021, the Council's Transport and Environment Committee (CD0154) approved a citywide target to reduce car kilometres by 30% by 2030. All development must work towards meeting this target. The infrastructure policies of the Plan support the City Mobility Plan's (CD062) ambition to shift car trips to more sustainable modes, in line with sustainable transport hierarchy. Support is given to development (or its mitigation) that is people focussed and reduces the reliance on private car use and helps the Council to meet its target. Mode shift is addressed in Issue 31 Transport Strategy. **No modification proposed.**

Michelle Mc Kinley (0432)

The City Centre Transformations delivery plan (CD061) includes improved access for all through measures such as dropped kerbs, widened footways, improved surfacing and disabled parking. Policy Inf 7 requires that private car parking meets standards for accessible parking. **No modification proposed.**

Mike Richardson (0109)

Paragraphs 2.111-2.137 set out how the Plan will meet the outcome of a city where you do not need a car to move around. It is appropriate to include education, health and waste

management within this section as these are elements of creating 20-minute neighbourhoods and reducing the need for a car. To meet the Council's citywide target to reduce car kilometres by 30% by 2030 measures are required to increase the use of modes other than private car. While car parking free or low parking developments are encouraged in the Plan it sets a requirement to meet accessible parking standards. Mode shift is addressed in Issue 31 Transport Strategy. **No modification proposed.**

NHS Lothian (0596)

Paragraph 2.125 refers to the Edinburgh Health and Social Care Partnership. This is a partnership between the City of Edinburgh Council and NHS Lothian. It is not necessary to refer separately to the partners that combine to form this partnership. **No modification proposed.**

Nicola McCowan Hill (0195)

The Plan sets out Edinburgh's mass transit network, including proposed new public transport actions from the City Mobility Plan (CD062) and the Edinburgh Sustainable Strategic Transport Study (CD071). The Plan identifies where public transport provision could be improved and extended, including strategic infrastructure such as the tramline from Granton to BioQuarter, new public transport routes to support growth in West Edinburgh and better connecting the city with orbital bus routes. The Plan enables delivery through its Action Programme, and policies on Community Infrastructure and Developer Contributions in conjunction with the City Mobility Plan. **No modification proposed.**

Policy Inf 1 supports development where key community facilities are walkable within a 20 minute trip. This supports the aim to ensure that everyone has access to a range of facilities through the promotion of 20 minute neighbourhoods. There may be potential for existing areas to benefit from the provision of community facilities in association with new development however the Plan can only provide policies against which to assess development proposals. **No modification proposed.**

**A city where everyone shares in its economic success**

Archie Clark (0003), Juniper Green and Baberton Mains Community Council (0306)

Paragraph 2.33 makes reference the number of residents living on incomes below the UK poverty threshold. As referred to in this paragraph the final report of the Edinburgh Poverty Commission sets out actions to end poverty. It is not agreed that the Plan should set out actions. **No modification proposed.**

Supplementary Guidance, City Centre Shopping and Leisure (CD046), sets out the approach to proposed changes of use of shop units within the city centre retail core. This guidance is kept under review and where appropriate will be updated to respond to changing retail trends. It is appropriate that this is guidance rather than include in the plan. As referred to in paragraph 3.10 the emerging Princes Street and Waverley Valley Strategy will consider opportunities to enhance the retail and leisure experience on Princes Street. It is not necessary to include further detail within the plan. **No modification proposed.**

Bryce Road is a designated local centre. It is listed in Part 2, Table 14 and identified on Map 11 and the proposals map. It is also identified within the adopted Edinburgh Local Development Plan (CD039) as a local centre. The centre contains 6 unit including a take-away, dentist and shops. As stated in the City Plan glossary for the purpose of the plan, a local centre is a shopping centre which usually has 10 units or more serving a local retail function, however in some instances centres of less than 10 units have been included to provide a local centre within walking distance of residents. Bryce Road is identified within the current LDP and serves a local retail function. **No modification proposed.**

Paragraphs 2.143 and 2.144 set out the key findings of the Commercial Needs Study (CD032, CD033, CD034, CD035, CD036) and are considered to be clearly worded. **No modification proposed.**

#### Edinburgh World Heritage (0339)

Paragraph 2.138 does not include any reference to the role of any element of the city in economic success. It would not be appropriate to include the suggested reference to the historic environment. **No modification proposed.**

#### Grange/Prestonfield Community Council (0192)

Paragraph 2.138 sets out what the Council's economic strategy seeks to do. It is a factual statement on the strategy. It is not the role of the Plan to set priorities. **No modification proposed.**

Paragraph 2.140 sets out what City Plan will do to deliver key land uses. Proposals for development will be assessed against the policies of the Plan and any other material considerations. It is not necessary to state the elements set out at paragraph 2.140 do not over-ride LDP policies. **No modification proposed.**

#### Leith Central Community Council (0614)

Compulsory Purchase is provided for in legislation and national guidance is available. It is not necessary for the Plan to set out guidance. **No modification proposed.**

#### NatureScot (0528)

The addition of the words "assets" and "natural" to paragraph 2.139 is not necessary. The paragraph provides examples of key sectors and is not an exhaustive list. **No modification proposed.**

#### Nuveen Real Estate (0564)

The Council does not consider it necessary to change the reference at paragraph 2.146 to St James Quarter. The use of Edinburgh St James provides a suitable and commonly understood reference. **No modification proposed.**

It is not appropriate for the Plan to set out the parameters of any future review of retail trends. The policies of the Plan establish the town centre first principle. **No modification proposed.**

#### Queensferry & District Community Council (0568)

Queensferry is identified in the Plan as a local centre. Reference to Queensferry as a town would cause confusion as retail policies within the Plan distinguish between local and town centres. **No modification proposed.**

SEPA (0012)

Paragraphs 2.138-2.140 sets out the key elements of the Council's economic strategy and provides examples of key sectors. The purpose of this section is to set out how the Plan can contribute to the economic success of the city. It is not necessary to include reference to particular markets and their role in supporting economic growth. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 2	Spatial Strategy	
Development plan reference:	The overarching spatial strategy of the plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Barratt David Wilson Homes (0677)</div><div>BDW Trading (0350)</div><div>BDW Trading (0678)</div><div>CALA Management Ltd (0465)</div><div>Calex Group Ltd (0556)</div><div>Dunedin Canmore (0766)</div><div>Friends of Cammo (0387)</div><div>Hallam Land Management (0457)</div><div>Hallam Land Management (0599)</div><div>Hallam Land Management (0615)</div><div>Howard Jones (0424)</div><div>J. Smart &amp; Co (Contractors) PLC (0483)</div><div>Juniper Green &amp; Baberton Mains Community Council (0306)</div><div>LPBZ Commercial Ltd (0391)</div><div>Luke Robertson (0114)</div><div>Mactaggart and Mickel Homes Ltd ( 312)</div><div>Melford Developments Ltd (0308)</div><div>Miller Homes Ltd (0256)</div><div>Miller Homes Ltd (0649)</div><div>Mr T Klan (0307)</div><div>Murray Estates (0197)</div></div><div><div>NatWest (0477)</div><div>Newcraighall Heritage and Residents Association (0759)</div><div>Persimmon Homes (0495)</div><div>Robertson Residential (0537)</div><div>Robertson Residential Group Ltd (0490)</div><div>Scottish Property Federation (0144)</div><div>SEED Co (0198)</div><div>Spokes Lothian (0545)</div><div>Steve Loomes (0767)</div><div>Stewart Milne Homes (0118)</div><div>Tarmac (0244)</div><div>Taylor Wimpey (0200)</div><div>The Association for the Protection of Rural Scotland (0334)</div><div>The Catchelraw Trust (0137)</div><div>The Stoddart Family (0749)</div><div>Tom Proudfoot (0740)</div><div>University of Edinburgh (0464)</div><div>Wright PDL (0078)</div><div>West Craigs (0352)</div></div></div>		
Provision of the development plan to which the issue relates:	The strategy for directing new growth within the plan area.	
Planning authority's summary of the representation(s):		
<div>General Strategy</div> <div>Wright PDL (0078), Barratt David Wilson Homes (0677)</div> <div>Sites allocated have not been promoted by landowners. Allocation of active business sites affects business plans and confidence in operations.</div> <div>The tightly wrapped nature if the green belt will not meet growth requirements and the description of the green belt's purpose is contrary to this. The plan is over reliant on brownfield placing strain on existing services.</div> <div>Should consider the views of Homes for Scotland on affordable housing. A brownfield only approach threatens delivery of affordable housing.</div>		



Barratt David Wilson Homes (0677)

Object to high risk nature approach and brownfield only strategy. Strategy conflicts with policy and aims of the plan. Greenfield development has been important for delivering homes of all tenure in recent years. Concerned about the Plans ability to deliver the required volume and range of housing to meet needs.

Spatial strategy is almost entirely dependent on reallocating sites to housing which are actively in other uses or allocated for employment uses.

Strategy will restrict availability of land for residential development and push home buyers outside the city into less well connected areas increasing reliance on car use. This will also be true of displaced businesses which will then use greenfield land.

There is no assessment of environmental impacts of demolishing/renovating existing buildings or business relocation including traveling to new locations and displacement of communities.

Areas of the city with no new land allocations limits the ability to deliver 20 minute neighbourhoods in these locations e.g. Balerno. Greenfield sites can better support sustainable development and 20 minute neighbourhoods.

BDW Trading (0678), BDW Trading (350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Ltd (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

The Plan is likely to deliver outcomes which are the opposite of the aims of the Plan. The spatial strategy proposes large scale displacement of employment land including active industrial estates and strategic business sites including the IBG and BioQuarter. There are no coherent plans for relocation. The Mixed Use Delivery Study outlines the scale of potential impacts on jobs. Proposals could leave Edinburgh as 'the UKs most unbalanced major city in terms of employment base, moving ahead of London'.

Support the aims but spatial strategy will not deliver them. Should be clearer ambition to support job creation and delivery of homes to meet growing population.

Housing targets fall substantially short of the full need and demand in HNDA2. Land supply will only deliver half of the homes in the plan (refers to Housing Land Supply Assessment supporting doc ref) Housing Land Supply table sets unrealistic delivery assumptions and incorrectly compares this inflated supply to the Housing Supply Target rather than the Housing Land Requirement.

Continuing with a spatial strategy where need and demand is not met in full is likely to lead to an uneven distribution of the benefits of growth benefitting homeowners over renters.

CALA Management Ltd (0465)

The Council has provided no evidence to demonstrate the strategy can be delivered. Choices states that it may not be financially viable to deliver the strategy and CPO is needed. If CPO is required then the costs, timescales and a strategy for the relocation of businesses should have been presented. Without this it is not possible to fully scrutinise

and respond to the proposed development strategy. That undermines the representation period and is unfair to parties making representations.

CALA Management Ltd (0465), Hallam Land Management (0599) Miller Homes Ltd (0649)

The proposed development strategy for housing relies only on brownfield land and the redesignation of existing employment allocations as housing led mixed use allocations. It does not propose new greenfield sites to meet its housing land requirement.

New site allocations identified by the Council for housing as part of its development strategy are identified in SESplan (2013) and are potentially not suitable for mixed use or are currently occupied commercial and employment purposes.

The Ryden Commercial Needs Study: Industrial Property Market (November 2018) and Commercial Needs Study: Mixed Use Delivery (December 2020) highlight issues with a brownfield first strategy. The Mixed Use Study predates MIR and is not a background document to the proposed plan. It notes the impacts of businesses having to relocate outside of Edinburgh.

The Environmental Report did not carry out an assessment of the potential impacts of the proposed development strategy. Methodology too narrow and does not consider all factors including population impacts from relocating businesses and CPO. Integrated Impact Assessment does not consider impacts from business displacement.

SESplan (SDP) requires 186 hectares of strategic land supply for employment use in Edinburgh. The SESplan Economy Technical Note (November 2011) did not identify the scale of strategic land supply for employment use at International Business Gateway (IBG). This was to be confirmed. Argues that if this was included the total requirement is 271Ha. Plan needs to demonstrate that the proposed mixed use communities do not result in a net loss to the overall strategic employment land supply.

All sites should be suitably programmed to ensure that the housing land requirement will be met in the development plan period.

Refers to further information in Development Strategy Statement (RD Ref)

Dunedin Canmore (0766)

Does not consider that all development should be directed to brownfield rather than greenfield land. An opportunistic approach should be taken. A number of allocated brownfield sites are constrained or unavailable

Hallam Land Management (0615)

Need more balanced strategy. Plan is not conducive to future investment. Policies are restrictive and inconsistent with Plan's aims. Strategy is not deliverable. Brownfield only strategy is unrealistic, unreasonable and unnecessary and inflexible and reliant on employment land.

No PAN (planning advisory note) on 20 minute neighbourhoods and policy objectives including place plans.

Examples of the use of brownfield first in other cities should be explored and measured. Consider strategy will result in the likelihood of removing existing mixed use communities.

Hallam Land Management (0615), Mr T Klan (0307)

Failure to plan for sufficient volume of housing in feasible and viable locations and question Housing Land Requirement. Failure to effectively review the greenbelt boundaries for City Plan 2030 and the overreliance on existing designation without any real environmental assessment in qualitative terms.

Lack of transparency and evidence regarding the preferred strategy being adopted by the Council during a period of resilience and recovery. No review of green belt boundaries has been undertaken and definition of green belt varies between SPP and SDP1.

City Plan is reliant on existing employment land to deliver its brownfield Spatial Strategy to the exclusion of greenfield land. Plan fails to link housing and employment markets with transport infrastructure as is the case in West Edinburgh. Plan will starve communities of investment.

Hallam Land Management (0457)

Should the Council continue to pursue a brownfield only strategy, they risk a significant housing land shortfall within the Plan period. Brownfield first is overly restrictive and lacks flexibility.

Calex Group Ltd (0556)

Consider that the brownfield strategy with no consideration of greenfield housing release is flawed and acts directly against the aims of the 20 minute neighbourhood. Believe that a combined option, of both brownfield development and a degree of greenfield land release is required for Edinburgh to meet its future housing requirements in the City Plan in full including housing for the elderly

J. Smart & Co (Contractors) PLC (0483)

The strategy has failed to make any new provision for industrial land. The majority of sites allocated are in active use.

Mactaggart & Mickel Homes Ltd (0312)

By seeking to provide new homes on existing and operational employment land the Council will not meet its basic aim of providing more homes, ensuring they are affordable, in the most appropriate location to allow and facilitate future economic growth. The plan highlights the greatest requirement is for affordable housing in paragraph, however, without any controlled or limited greenfield housing land release via a blended brownfield and greenfield strategy, the Council's stated strategy is going to exacerbate the affordable housing need, yet further. Pursuing new housing on existing and operational employment land present planning challenges before they can eventually be developed. This may in turn lead to a situation where the level of affordable housing that can be offered, on any of

the new strategic housing led developments will be far less than 35%. This encapsulates the flawed strategy.

Mactaggart and Mickel Homes Ltd (312), The Stoddart Family (0749), Homes for Scotland (0404)

Strategy does not allocate brownfield land as per the definition in Scottish Planning Policy. Allocated sites are active employment uses. Strategy should be based on a combined brownfield and greenfield strategy. A combined strategy will deliver the homes an expanding city requires, providing a range of tenure and choice. Strategy will fail to deliver the homes the city requires.

The phraseology of 'brownfield land rather than greenfield land' would make you believe that it was an either or situation. This is a gross simplification and vast distortion of the actual planning options available to the City of Edinburgh Council.

Melford Developments Ltd (0308)

Maps 1 and 2 (spatial strategy) are overly restrictive in terms of boundaries and designations.

Sites may not come forward for housing given existing uses. If Council wishes to encourage urban redevelopment allocations must be more flexible.

Miller Homes Ltd (0256)

Risk that the reliance of brownfield land to deliver new homes will result in neighbourhoods which have gaps in their service provision and will not deliver on 20 minute neighbourhoods. The ability of greenfield sites, like that at Riccarton Village, to deliver this has simply been overlooked without justification.

By relying on brownfield land to address development needs there remains a significant shortfall in the scale of new housing allocations required to meet the housing land requirements in full.

NatWest (0477)

Brownfield strategy will not deliver required housing targets as sites will not come forward. CPO is time consuming and costly and will not deliver sites by 2032. Not releasing new greenfield land will mean the council will not be able to build enough homes to meet its objectives. Option C of the choices consultation should be pursued.

Robertson Residential (0537)

Strategy should be amended to include a balanced approach of greenfield and brownfield sites to ensure no housing shortfall.

Tarmac (0244)

Plan uses green belt and countryside designations without focussing on critical tests for development. Plan will starve communities such as Ratho of investment.

Lack of transparency and evidence regarding the preferred strategy being adopted by the Council during a period of resilience and recovery. Brownfield only' strategy as it is inflexible.

Plan fails to link housing and employment markets with transport infrastructure, this particularly being the case in West Edinburgh. Promotes site at Bairdview Ratho.

The Catchelraw Trust (0137)

Overreliance on non deliverable and constrained brownfield sites.

Steve Loomes (0767)

Brownfield only strategy high risk and conflicts with aims and policies of the plan. Will not deliver volume and range. Lack of housing reduces the workforce and negatively impacts on the City's economy.

LPBZ Commercial Ltd (0391)

The plan focusses on housing on brownfield sites only at all costs, to the detriment of existing and expanding operational business sites and new sites for office development. The plan does not support sustainable economic growth and does not propose truly mixed-use development as office use is largely not permitted on these sites.

Scottish Property Federation (0144)

We are concerned that the plan places too much confidence in the successful compulsory purchase and reallocation for housing of several employment sites. Even if successful on a timely basis, the reallocation of existing businesses means that far from finding new opportunities to grow the economy, the city will find itself struggling to maintain the current number of industrial jobs and businesses.

Luke Robertson (0114)

Concerns over the destruction of greenfield sites and the need for green spaces to be maintained.

Tom Proudfoot (0740)

Concerns that best quality arable land is being built on need more allotments and less shopping malls and endless sprawl, Eastwards East Lothian and Musselburgh needs to be a separate un-consolidated urban area.

Spokes Lothian (0545)

Concerned that strategy releases more greenfield land that locks in car dependency.

West Craigs (0352)

The environmental impact of the brownfield strategy is not properly assessed in terms of carbon emissions and embodied carbon. Refers to RD Savills Embodied Carbon Report.

## **Green Belt and Greenfield**

### **Tarmac (0244)**

Failure to effectively review the greenbelt boundaries for City Plan and the overreliance on existing designation without any real environmental assessment in qualitative terms.

### The Association for the Protection of Rural Scotland (0334)

Opportunities to enhance the protection of peri-urban countryside by Green Belt designation should also be considered. (2.58 2nd bullet)

CEC must also be consulted about proposed development on Green Belt administered by Midlothian Council and East Lothian Council so that the quality of adjoining city edges can be properly protected/enhanced.

### Newcraighall Heritage and Residents Association (0759)

Plan shows green belt has been eroded on the east, causing coalescence with Musselburgh and other developments in East and Mid Lothian. Green space easily lost to more development. There does not appear to be sufficient 'joined up thinking' about the ability of the infrastructure to cope with developments being made from the city and also East and Mid Lothian, and how the demand at the commercial centre at Fort Kinnaird overloads the roads and other services

### University of Edinburgh (0464)

Consider green belt limits growth at Kings Buildings and Peffermill and that these boundaries have not recently been reviewed and assessed. Considers a review of green belt allocations is required so that the land designated is fit for purpose and meets the criteria for protection.

### Friends of Cammo (0387)

Support the aim of directing development to brownfield not greenfield land. In particular, there should be no additional housing development on the green belt beyond Maybury Road. Further development in West Edinburgh should be limited to the area shown in red in Map 1 - Spatial Strategy.

### Juniper Green & Baberton Mains Community Council (0306)

Parts of the green belt have been pierced and others appear vulnerable and could easily be breached. Green belt should be reinforced to halt further urban sprawl.

### Howard Jones (0424)

Concern areas of greenspace will be allocated for development but will fail to deliver and land will be developed for developer's profit at the expense of residents.

## **Modifications sought by those submitting representations:**

### **General Strategy**

Wright PDL (0078), Barratt David Wilson Homes (0677), Steve Loomes (0767)

A greater volume and range of land should be allocated for residential and business development and that do not displace businesses.

Barratt David Wilson Homes (0677), BDW Trading (0678), BDW Trading (350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Ltd (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

A greater volume and range of land is required to be allocated for residential development in accessible areas and that does not result in the displacement of businesses that are accessible, and do not result in the displacement of existing operational businesses. Consider amendments are needed to facilitate achieving the aims.

BDW Trading (0678), BDW Trading (350), Murray Estates (0197)

Support the aims but spatial strategy will not deliver them. Should be clearer ambition to support job creation and delivery of homes to meet growing population.

Amend spatial strategy to blended approach allocating deliverable greenfield and brownfield land sufficient to meet housing need and demand.

Housing Land Requirement and Housing Land Supply are deficient and should be changed and substantially more housing allocations made.

CALA Management Ltd (0465), Hallam Land Management (0599) Miller Homes Ltd (0649)

The Council should reconsider its special strategy. Option 3 Blended approach in Choices would balance brownfield and greenfield allow reasonable alternatives from greenfield to deliver the housing land requirement.

Dunedin Canmore (0766)

Promotes site at Cammo Fields.

Hallam Land Management (0615)

Amend strategy to blended approach with greenfield release. Amend plan to be in accordance with SPP and NPF3. Include Craigiehall and Goodtrees Farm sites. Countryside designation should not be same as green belt.

Mr T Klan (0307)

The strategy should be amended to reflect a more balanced and sustainable mixed blended approach with a good share of greenfield release in accordance with the Choices Strategy. Greater cognisance needs to be taken of housing demand and affordability together with effective delivery of the volume of land required in the city

Hallam Land Management (0457)

Should identify further greenfield sites to supplement the brownfield land identified in the plan.

Calex Group Ltd (0556)

Amend strategy for a combined option for housing delivery for all tenures of both brownfield development and a degree of greenfield land release.

J. Smart & Co (Contractors) PLC (0483)

Support a blended approach that includes both brownfield and greenfield land for development.

Mactaggart and Mickel Homes Ltd (312), The Stoddart Family (0749), Homes for Scotland (0404)

A combined brownfield and greenfield strategy is required to deliver the homes the city needs over the City Plan period.

Melford Developments Ltd (0308)

Allocations must be more flexible.

Miller Homes Ltd (0256)

Strategy should be a blended approach.

NatWest (0477)

Strategy should be amended to include a balanced approach of greenfield and brownfield sites.

Robertson Residential (0537)

Strategy should be amended to include a balanced approach of greenfield and brownfield sites.

Tarmac (0244)

Differentiate between greenbelt and countryside. Improve baseline mapping on maps 1 and 2. Clearly define West Edinburgh Strategy Area.

The Catchelraw Trust (0137)

Should be a blend of greenfield and brownfield sites.

Scottish Property Federation (0144)



Revise paragraph 2.41 to remove emphasis on CPO.

Luke Robertson (0114)

None specified.

West Craigs (0352)

Should compare strategies in terms of embodied carbon.

### **Green Belt and Greenfield**

#### **Tarmac (0244)**

Representation implies a review of the green belt should be undertaken.

Newcraighall Heritage and Residents Association (0759)

There should be green belt protection on the east side of the city. Open space should be protected to prevent housing areas proposed by the city and also East and Mid Lothian all meeting up at the boundaries, creating one huge housing estate.

p19 para 2.5.1 Newcraighall mining village should be made a conservation area

University of Edinburgh (0464)

A review of green belt allocations is required.

Friends of Cammo (0387)

No modification specified.

Juniper Green & Baberton Mains Community Council (0306)

Green belt should be reinforced to halt further urban sprawl.

Howard Jones (0424)

No modification specified.

### **Summary of responses (including reasons) by planning authority:**

Wright PDL (0078), Barratt David Wilson Homes (0677), BDW Trading (0678)

The plan allocates a total land supply for housing which is in excess of the housing targets and the allocation of employment land has also increased over that of the existing plan. Overall housing allocations are split 60% brownfield and 40% greenfield. 68% of larger 'strategic sites' are on greenfield land. The strategy therefore provides enough land to meet needs on a range of different sites. More details can be found in Issues 19, 20 and 37. A response to impact on businesses can be found in issue 3. **No modification proposed**

Barratt David Wilson Homes (0677), BDW Trading (0678), BDW Trading (350), Hallam Land Management (0615), Steve Loomes (0767)

The Plan does not have a strategy of reallocating active business/industrial sites and allocated employment land to housing uses. Part of the strategy of the plan is to promote the redevelopment of existing brownfield sites. These sites are within the urban area and are not allocated for employment use within the existing LDP (CD039). These sites are to be mixed use and will be required to re-provide for business uses as part of mixed use communities. They will not displace all businesses. The Mixed Use Delivery Report (CD036) recognises the existing long term trend for the redevelopment of older industrial buildings as sites for housing and the strategy seeks to address this trend and ensure we deliver sustainable communities by requiring mixed use development on sites. Issue 3 provides further information on the delivery of the strategy in relation to businesses.

Whilst there will be need for demolition and refurbishment, the Commercial Needs Study undertaken to inform the Choices, notes that a significant amount of existing industrial stock (as proposed for allocation) is older and of poorer quality. Many of these buildings would not meet modern requirements for energy efficiency. Demolition or refurbishment provides the opportunity to improve efficiency and minimise environmental impacts and will be assessed under policies Env 7 and 8 in terms of suitability and sustainability.

The strategy allocates new development to sustainable locations where they are or can be served by public transport and services. **No modification proposed.**

Steve Loomes (0767)

City Plan provides sufficient housing land to meet its workforce needs. This is addressed further in Issue 19: Housing Supply Target and Land Requirement. **No modification proposed.**

CALA Management Ltd (0465)

The delivery of the strategy is considered in full under Issue 3. This demonstrates that the strategy is deliverable and does not rely solely on a programme of CPO and relocation of businesses. The Council has prepared development phasing (CD REF) which demonstrates that a supply of land throughout the plan period. **No modification proposed.**

BDW Trading (0678), BDW Trading (350), Murray Estates (0197)

The plan meets the market housing requirement of HNDA2 in full and sets an affordable housing target which is considered 'reasonable' in line with the requirements of SPP and based on wider economic, social and environmental factors, issues of capacity, resource and deliverability. Housing targets and land supply are addressed under issues 19 and 20. **No modification Proposed.**

**General Strategy**

CALA Management Ltd (0465), Hallam Land Management (0599) Miller Homes Ltd (0649), Melford Developments Ltd (0308), Miller Homes Ltd (0256), NatWest (0477), The Catchelraw Trust (0137), Steve Loomes (0767)

The spatial strategy of the plan does not only rely on brownfield land for the delivery of housing. As noted above, housing allocations are split 60% brownfield and 40% greenfield. 68% of strategic sites are greenfield and relate to existing LDP allocations or sites with existing planning permission.

Part of the strategy of the plan is to promote the redevelopment of existing brownfield sites. These sites are within the Urban Area and are not allocated for employment use within the existing LDP. These sites are proposed as housing-led mixed-use allocations and will not displace all businesses. The Mixed Use Delivery Report (CD036) recognised the existing long term trend for the redevelopment of older industrial building as sites for housing and the strategy seeks to address this trend and ensure we deliver sustainable communities on mixed use sites with facilities available close by. Issue 3 Delivery of the Strategy provides further information on the strategy in relation to businesses.

The Environmental Report and Integrated Impact Assessment measure the proposed plan against criteria relevant to the plan and its strategy. No strategy of business displacement and accompanying programme of CPO is proposed as part of the plan. CPO powers would only be used if necessary, needed or required. **No modification proposed.**

Dunedin Canmore (0766)

The plan does not direct all development to brownfield land. It is unclear what is meant by an 'opportunistic approach'. However, the Council maintains the importance of a plan led system with a range of sites allocated. The Council has prepared development phasing (CD176) which demonstrates that a supply of land throughout the plan period. **No modification proposed.**

Hallam Land Management (0615), Mr T Klan (0307)

The Plan's spatial strategy provides for a range of sites on both brownfield and greenfield land. The delivery of the strategy is considered in full under Issue 3. The Council has prepared development phasing (CD176) which demonstrates that a supply of land throughout the plan period.

In line with the Town and Country Planning (Scotland) Act (1997) (CD101) section 16 2 (c) the Council consider that it is appropriate to consider emerging policy and strategy where this is relevant in preparation of the Plan, particularly where this is more recent. This has included Fourth National Planning Framework: position statement (2020) (CD098) and other emerging work at national, regional and local level in preparation of the proposed plan. It is not considered that national planning advice notes are required to support 20 minute neighbourhoods or place plans. The concept of ensuring communities are within walkable distance to services and served by public transport are not new concepts to planning even if the term 20 minute neighbourhood is more recently used to describe similar ambitions. Place plans are prepared by communities and these are generally in early stages of production. Setting out that City Plan will support these is not considered unreasonable.

The Plan and its strategy have been subject to appraisal through the Environmental Report (CD010). Review of allocating sites as part of the current green belt or countryside designation was part of the Choices MIR. The purpose of a Green Belt is outlined in the Scottish Planning Policy and it is for Development Plans to designate.

Housing targets and land supply are addressed under issues 19 and 20. The suggested inclusion of Craigiehall and Goodtrees Farm are addressed under issue 9 Additional Greenfield Sites. **No modification proposed.**

Hallam Land Management (0457)

The spatial strategy of the plan does not only rely on brownfield land for the delivery of housing. As noted above, housing allocations are split 60% brownfield and 40% greenfield. 68% of strategic sites are greenfield and relate to existing LDP allocations or sites with existing planning permission.

The Council has prepared development phasing (CD176) which demonstrates that a supply of land throughout the plan period. **No modification proposed.**

Calex Group Ltd (0556)

Paragraph 2.2 sets out the aims of City Plan. The spatial strategy which directs new development to and maximises the use of brownfield land rather than greenfield land, is in accordance with SPP 2014 paragraph 40 (CD096). **No modification proposed.**

J. Smart & Co (Contractors) PLC (0483)

As noted in Issue 3: Delivery of the Strategy, the Council considers that allocating further land for industrial development is unnecessary. The proposed brownfield development sites identified within the plan which currently have business uses on them are being promoted for mixed use housing led development and not just housing development which is a fundamental part of the strategy. **No modification proposed.**

Mactaggart and Mickel Homes Ltd (312), The Stoddart Family (0749), Homes for Scotland (0404)

As noted above the strategy provides for allocations on a range of brownfield and greenfield sites at a range of scales. Part of the strategy of the plan is to promote the redevelopment of existing brownfield sites. These sites are within the Urban Area and are not allocated for employment use within the existing LDP. These sites are proposed as housing-led mixed-use allocations and will not displace all businesses. The Mixed Use Delivery Report (CD036) recognised the existing long term trend for the redevelopment of older industrial building and the strategy seeks to address this trend and ensure we deliver sustainable communities on mixed use sites with facilities available close by. Issue 3 Delivery of the Strategy provides further information on the strategy in relation to businesses

At the Choices MIR stage three options for the spatial strategy were presented with a brownfield led strategy set as the preferred option. The proposed plan is not required to set out alternative options. **No modification proposed.**

Tarmac (0244)

Maps 1 and 2 are diagrammatic. Allocations and designations are shown on the Proposals Map which forms part of the plan. Map 24 also defines the West Edinburgh Strategy Area.

As noted above, the strategy was subject to consultation as part of the Choices MIR (CD022).

Site proposals are dealt with in Issue 9 suggested additional greenfield sites. **No modification proposed.**

LPBZ Commercial Ltd (0391)

As noted above the plan does not solely focus on brownfield only sites. Office use is generally considered an acceptable use alongside housing. The plan does not state that this would not be permitted. **No modification proposed.**

Scottish Property Federation (0144)

As set out in Issue 3 Delivery of the Strategy, there is not a strategy to CPO brownfield sites. The use of CPO would be limited to exceptional circumstances when other options had been explored. It is not intended to reallocate all businesses as the redevelopment of sites are to be on a mixed use basis including reprovision of employment. **No modification proposed.**

Luke Robertson (0114)

The strategy of the plan protects existing green spaces and minimises new greenfield sites. **No modification proposed.**

Tom Proudfoot (0740), Spokes Lothian (0545)

The plan does not propose any further greenfield release for housing other than sites which are previously allocated or subject to an existing planning consent. **No modification proposed.**

West Craigs (0352)

The strategy of the plan has been assessed in the Environmental Report (CD010). Comparison of alternative strategies is not required at the proposed plan stage. Under City Plan policy Env 7 proposals for the replacement of existing buildings are required to prepare a carbon assessment this will allow assessment of individual development proposals. **No modification proposed.**

Simon Thompson (0248)

The Council considers the wording of paragraphs 2.88, 2.110, 2.112 and 2.109 to be robust and will ensure that the aims of the strategy are delivered. The Council's position relative to suggested additional greenfield sites can be found in issue 9. **No modification proposed.**

## Green Belt and Greenfield

### Newcraighall Heritage and Residents Association (0759)

The release of green belt to the east of the city was planned and released as part of the current set of development plans - Strategic Development Plan 1 (SDP1) (CD087) and Local Development Plan, 2016. The growth has been coordinated at a strategic level through SDP1. City Plan does not propose further green belt release in this area. **No modification proposed**

### University of Edinburgh (0464), Tarmac (0244)

The Housing Study (CD026) which accompanied the Choices MIR assessed all greenfield sites including those within the green belt. This information was used to inform the approach to the spatial strategy of the plan. A review of the green belt is not considered appropriate or necessary at this time. Changes or growth of existing uses within the green belt can be assessed through the development management process under relevant policies and this approach is acknowledged by the representee. Comments on individual sites are addressed under Issue 9. **No modification proposed.**

### Friends of Cammo (0387)

The plan does not release any further green belt land as shown on the proposals map and spatial strategy diagram map 2. **No modification proposed.**

### Juniper Green & Baberton Mains Community Council (0306)

The plan does not propose any new green belt release for housing and allocates sufficient land for housing to ensure green belt release is not needed preventing sprawl. The proposals map provides clear boundaries for the green belt and the urban area. **No modification proposed.**

### Howard Jones (0424)

The plan does not allocate any new greenfield or green spaces for development. **No modification proposed.**

### **Reporter's conclusions:**

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### **Reporter's recommendations:**

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Issue 3	Delivery of the Strategy	
Development plan reference:	Delivery of the plan's spatial strategy	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Barratt David Wilson Homes (0677)</div><div>BDW Trading (0350)</div><div>Cala Management (0316)</div><div>CALA Management Ltd (0465)</div><div>Dandara East Scotland (0757)</div><div>Edinburgh Chamber of Commerce (0379)</div><div>Forth Ports (0496)</div><div>Framework (Edinburgh) Limited (0743)</div><div>Hallam Land Management (0615)</div><div>Hallam Land Management (0599)</div><div>Homes for Scotland (0404)</div><div>J. Smart &amp; Co. (Contractors) PLC (0483)</div><div>Landowner of East Foxhall (0544)</div><div>Leith Central Community Council (0614)</div><div>Lord Dalmeny (0475)</div><div>Miller Homes Limited (0649)</div></div><div><div>Murray Estates (0197)</div><div>Persimmon Homes (0495)</div><div>Robertson Residential Group Ltd (0490)</div><div>Rosebery Estate (0618)</div><div>Scottish Property Federation (0144)</div><div>SEEDco (0198)</div><div>Steve Looms (0767)</div><div>Stewart Milnes Homes (0118)</div><div>Stirling Developments Limited (0303)</div><div>Stoddart Family (0749)</div><div>Tarmac (0244)</div><div>Taylor Wimpey (0200)</div><div>Taylor Wimpey East Scotland (0770)</div><div>The Royal London Mutual Insurance Society</div><div>West Craigs Limited &amp; Dunedin Canmore Housing Association (Wheatley Group) (0352)</div><div>Wright PDL (0078)</div></div></div>		
Provision of the development plan to which the issue relates:	Relates to the strategy and aims of the plan, in particular directing new development to brownfield rather than greenfield land (Aim 2) and delivering Edinburgh's key economic land use needs (Aim 10)	
Planning authority's summary of the representation(s):		
<div><div>Business Impacts</div><div><div>BDW Trading (0350)</div><div>The basis for the Plan's development strategy, as set out in Aim 2, is to avoid the release of any currently unallocated greenfield sites for development. Such an approach has never been attempted before and carries enormous risks for the future of the city.</div><div>The spatial strategy proposes the large-scale displacement of employment land, including many active industrial sites and large-scale strategic business sites (International Business Gateway and Edinburgh Bioquarter), but there are no coherent plans for relocation. The Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery, prepared for the Council, outlines the potential scale of the impact of this on jobs.</div></div></div>		

The proposals in the Plan to redevelop large areas of the city with currently active businesses could leave Edinburgh as the UK's most unbalanced major city in terms of employment base, moving ahead of London.

It would also appear to be the case that reallocating employment sites for housing use, particularly without a clear reprovisioning strategy is contrary to the terms of SESplan. The proposals in the Plan are therefore inconsistent with current regional and national policies.

BDW Trading (0350), Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495)

Re-allocating approximately 400 active businesses and strategic employment sites for housing will not deliver Edinburgh's key economic land use needs. Such an approach will be completely contrary to aim 10 of the Plan in respect to the City's industrial economy base. If this displacement strategy is ultimately adopted, then aim 10 needs to be revised to acknowledge that.

Object to the Proposed City Plan's over-arching strategy of reallocating active business/industrial sites and allocated employment land to housing uses. This objection is not to specific proposals contained in the Plan, rather it is an objection to the over-arching strategy. In particular the allocation of land accommodating approximately 400 active businesses in the City for housing use, to be delivered within the plan period by 2032, and with the threat of compulsory purchase to achieve that objective.

This is a very radical strategy, the direction of which is without precedent in any major City in the UK. However, there appears to have been no meaningful consideration of its consequences. There is no substantive explanation of the approach taken in the 'Strategy' or 'Outcomes' sections of the Plan. That has the significant potential to mislead stakeholders, particularly the wider public, and may therefore lead to people not making representations which they might otherwise have made.

Richard March of 4-Consulting has been commissioned to consider the implications of the Proposed Plan's strategy for employment land, however, the report was not available in time for the representation period deadline. Therefore, he has provided an overview of the strategy and has highlighted that significant further assessment is required to fully understand the likely consequences. This is the kind of work that the Council is obliged to undertake, but it has not been done in this case. Planning Circular 6/2013 'Development Planning' states the following:

"Evidence is required to inform plan-making, justify the plan's content, and provide a baseline for later monitoring. Information gathering and analysis should serve efficient high quality plan-making. Certain aspects of the evidence base (such as Housing Need and Demand Assessment, and transport appraisals) are likely to be essential at each plan review. Authorities should therefore take a proportionate approach and consider what is required, and where scarce resources can best be spent, to inform the particular issues being addressed in the plan. A robust evidence base will also be critical at any subsequent development plan examination."

Therefore, the Council is strongly encouraged to undertake a robust assessment of the Plan's 'economic strategy' prior to the Examination and provide the opportunity for stakeholders to comment upon it. It seems likely that the outcome of this assessment



would confirm the view that the strategy will have significant negative consequences and should lead to a rethink of the decision not to allocate any additional greenfield land for development in the City. It is not clear whether Council will undertake this assessment and therefore objectors are considering whether to commission the work directly.

#### 4 Consulting Overview: Conclusions

Redeveloping industrial buildings to accommodate new housing is not simply a matter of matching the supply and demand of industrial land. The approach should consider the key role played by Edinburgh's industrial and related business sites in providing much needed jobs and income for some of the City's most deprived communities. This issue is not addressed in City Plan 2030. A fuller consideration of how competing demands could be better balanced is more likely to realise the ambition of a city where everyone shares in its economic success.

City Plan 2030 could leave Edinburgh as having the UK's most unbalanced economic employment base of any major city in the UK, moving ahead of London.

The proposals present clear challenges to the development of key Scottish Government policies, but their consequences have hardly been considered by the Council.

#### SEEDco (0198)

The spatial strategy proposes the large-scale displacement of employment land, including many active industrial sites and large-scale strategic business sites (International Business Gateway and Edinburgh Bioquarter), but there are no coherent plans for relocation. The Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery, prepared for the Council, outlines the potential scale of the impact of this on jobs.

The proposals in City Plan 2030 to redevelop large areas of the city with currently active businesses could leave Edinburgh as the UK's most unbalanced major city in terms of employment base, moving ahead of London.

It would also appear to be the case that reallocating employment sites for housing use, particularly without a clear reprovisioning strategy is contrary to the terms of SESplan. The proposals in the Plan are therefore inconsistent with current regional and national policies.

#### Hallam Land Management (0615)

The Council needs to make provision for the employment and economic needs of a growing population. It should not be de-allocating or diluting employment land in favour of replacement housing in less appropriate or less sustainable locations across the city.

New housing allocations and neighbourhoods are best planned in sustainable locations such as Balerno rather than on formerly designated employment land.

#### Stirling Developments Limited (0303), Dandara East Scotland (0757)

Have concerns regarding the displacement of existing businesses (to make way for housing) and overall economic concerns resulting from an under-delivery of homes by pursuing the brownfield only approach.

Econ 1- the Council's Economy Strategy sets out steps and actions needed to enable good growth for Edinburgh's economy. We would consider the proposed loss of significant amounts of employment land to be contrary to this aim.

It is also worth noting the contribution that house building itself makes to the local economy, including in terms of creating and supporting jobs.

Has the Council identified which current landowners and businesses will willingly clear/vacate employment sites in order to facilitate housing development? Has it undertaken a cost analysis of voluntary or compulsory land purchase for those sites where it will be working against landowner and occupier preferences?

Econ 2 - the Plan proposes to displace a significant number of active businesses so their current sites can be repurposed for housing development. This Policy gives those displaced businesses the additional headache of having to also ensure 50% of their new site is also used for housing development.

Steve Looms (0767)

The Plan is too reliant on existing employment land to deliver new homes. To enable a sufficient volume and range of homes to be built as required by SPP and to combat the housing affordability crisis facing the City, a wider variety of housing land requires to be allocated or otherwise given policy support. This should include an element of the greenfield land that has been such an important contributor to housing delivery in Edinburgh under the current and previous plans.

Whilst the Council appears accepting of the need to meet more of its own housing need and demand within city limits, reducing the displacement of families to elsewhere in the region and in consequence increasing car commuting between Edinburgh and surrounding areas, it has on the other hand inadvertently planned for the mass displacement of the businesses currently *occupying* the newly allocated housing sites. It has not considered where these businesses will go and what the car travel impacts of their dispersal will be. The spatial strategy proposes the large-scale displacement of employment (particularly in industry), but there are no coherent plans for relocation in the city. Greenfield land would need to be released to accommodate the displacement, but that would defeat the Plan strategy not to allocate any new greenfield sites. Also, active employment sites would need to be purchased at existing use value, which in some cases could outstrip residential development value due to income in perpetuity versus residential value of land, thus some sites won't be viable to purchase.

These issues mean City Plan is non-compliant with Scottish Planning Policy (SPP) (2014), which states (paragraph 119); "Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement".

Several of the newly allocated sites currently have a retail element. Policy Re 4 presumes against the conversion of shop units to residential use, and safeguards these for shopping and small business use. However, conversion to residential use could be supported where the shop unit has been vacant for a significant period of time and been actively marketed, where there is a local need and demand for a range of housing types and for

town centre living. It is not clear how this requirement aligns with the allocation of these businesses for residential development. It is not clear if existing and operational retail premises that have been allocated will also be required to remain vacant for a “significant period” of time.

At the heart of City Plan Proposed Plan is a spatial strategy which is almost entirely dependent on reallocating sites to housing which are actively in other uses or allocated for employment uses.

There is no assessment of the environmental impacts of, firstly, the embodied carbon release as a result of demolition/renovation of the existing buildings, nor secondly, the consequences of business relocation more broadly in terms of the displacement of communities, increased travelling times for businesses that relocate in more peripheral areas, etc. We are concerned at the level of displacement of businesses that currently occupy the newly allocated sites, which may lead to an increase in car dependence for some, as these businesses may well relocate to more peripheral areas. We object to the fact the Council has failed to properly consider this.

The spatial strategy of developing homes on a patchwork of employment sites will erode the mixed-use nature of the city and would force jobs and people out of the city, into the surrounding areas. This was made clear to the Council in the Ryden report and appears to have been ignored. There is no clear strategy of re-provision for displaced businesses.

The Plan certainly does not support existing businesses. Representations submitted by RRG and others, indicates that the vast majority of sites proposed for housing are currently in active employment uses and that displacement of these is likely to have significant impacts on Edinburgh’s employment base. In any circumstances, the Council has failed to justify this strategy or consider its consequences.

Furthermore, driving operational businesses away from the city will affect the economic resilience of the city.

It is unclear whether the Ryden Mixed Use Delivery Report has been considered. This report highlighted that the allocation of these sites for residential development would lead to a significant reduction in employment land and require a very active industrial development programme to reaccommodate even a proportion of this displaced activity. The report concluded that it was likely that larger users would continue to migrate to West Lothian and small/medium users to estates in East Lothian and Midlothian around the A720 City Bypass, as well as potentially to south Fife, as a result of the proposed allocation of these sites.

Several of the new sites allocated for residential development have been put forward by the Council, not promoted by the landowner. Allocating these sites (particularly those that are occupied by currently active businesses) risks compromising the business plans that may be in place. Confidence in continued operation will decrease, and this is particularly relevant with regards to the possible threat of CPO. This affect will be felt particularly strongly in North-East Edinburgh, wherein there are several newly allocated sites on premises occupied by operational businesses.

Furthermore, the allocation of several of the new sites across Edinburgh would result in the displacement of numerous active and functional businesses. It is not clear what stage

negotiations with each of the landowners and occupiers has got to. It is not clear what the Council's strategy for relocating these businesses is. It is not clear how does this approach assists with the aim of reducing the need to travel via/own a car.

Furthermore, it appears the Council has not properly considered the economic/socio-economic/environmental impacts on the businesses and the moving out of these businesses. Without this, it is difficult for consultees or even the Council itself to fully understand the impacts of the spatial strategy, and therefore its appropriateness.

Finally, the businesses displaced as a result of the proposed housing allocations will likely need to relocate, and this could result in them moving to less sustainable, greenfield sites. It is not clear if a relocation strategy been established to provide certainty that the relocation of these businesses will result in a fundamentally more sustainable land use and transport pattern.

Barratt David Wilson Homes (0677), Dandara East Scotland (0757)

The Plan is too reliant on existing employment land to deliver new homes.

The Council looks to accept the need to meet more of its own housing need and demand within city limits, reducing the displacement of families to elsewhere in the region and in consequence increasing car commuting between Edinburgh and surrounding areas. The reliance on brownfield land, often constrained and containing with existing businesses will reduce the rate of housing delivery and exacerbate social problems.

It has on the other hand inadvertently planned for the mass displacement of the businesses currently occupying the newly allocated housing sites. It has not considered where these businesses will go and what the car travel impacts of their dispersal will be. The spatial strategy proposes the large-scale displacement of employment (particularly in industry), but there are no coherent plans for relocation in the city. Also, active employment sites would need to be purchased at existing use value, which in some cases could outstrip residential development value due to income in perpetuity versus residential value of land, thus some sites won't be viable to purchase.

Several of the newly allocated sites currently have a retail element. Policy Re 4 presumes against the conversion of shop units to residential use, and safeguards these for shopping and small business use. However, conversion to residential use could be supported where the shop unit has been vacant for a significant period of time and been actively marketed, where there is a local need and demand for a range of housing types and for town centre living. It is not clear how this requirement aligns with the allocation of these businesses for residential development. It is not clear if existing and operational retail premises that have been allocated will also be required to remain vacant for a "significant period" of time.

The allocation of several of the new sites across Edinburgh would result in the displacement of numerous active and functional businesses. What stage have negotiations with each of the landowners and occupiers got to? What is the Council's strategy for relocating these businesses?

It is unclear whether the Ryden Mixed Use Delivery Report has been considered. This report highlighted that the allocation of these sites for residential development would lead

to a significant reduction in employment land and require a very active industrial development programme to reaccommodate even a proportion of this displaced activity. The report concluded that it was likely that larger users would continue to migrate to West Lothian and small/medium users to estates in East Lothian and Midlothian around the A720 City Bypass, as well as potentially to south Fife, as a result of the proposed allocation of these sites.

CALA Management Ltd (0465)

The Council should re-consider its spatial strategy as set out in the Plan. The most appropriate spatial strategy is referred to as Option 3 A blended approach as set out in Choice 12 in the MIR. The Plan is not supported by a background document that addresses the impact on the loss of the economic or employment land supply for pursuing the proposed development strategy – the Plan is silent on the impact of mixed use housing proposals on the economic sites identified as part of SESplan Policy 2 Supply and Location of Employment Land.

Scottish Property Federation (0144)

The challenge of large scale relocation of existing businesses from their current premises will mean that new sites will need to be found before additional supply of much needed industrial sites.

Framework (Edinburgh) Limited (0743)

Stewartfield is a thriving industrial estate with a variety of tenants. These plans would impact existing businesses, who do not fall within Class 4 business use, with their ability to trade and with no offer of viable replacement industrial sites. Relocating businesses to the outskirts of the city will entail lengthy commutes for employees and their customers, leading to a contravention of the Council's " 20 Minute Neighbourhood " goal. More housing will create fewer places to work locally and put an increased strain on an existing overburdened community infrastructure. The proposed development and loss of one of Leith's few remaining light industrial sites would set an undesirable precedent.

Hallam Land Management (0599)

Council has failed to set out a strategy for the relocation of businesses that would be displaced and this should have been presented and explained before the Planning Committee approved the Proposed LDP for the representation period. Without this information, it is not possible to fully scrutinise and respond to the proposed development strategy. That undermines the representation period and is unfair to parties making representations.

Stewart Milnes Homes (0118)

Re-allocating approximately 400 active businesses and strategic employment sites for housing will not deliver the outcome, "A city where everyone shares in its economic success". Instead there will be a disproportionate negative impact on some of the most deprived communities in the City. Therefore, a fundamental change in strategy is required, which supports business and industry in the city.

Object to the Plan's over-arching strategy of reallocating active business/industrial sites and allocated employment land to housing uses but not specific allocations.

This is a very radical strategy, the direction of which is without precedent in any major City in the UK. However, there appears to have been no meaningful consideration of its consequences. There is no substantive explanation of the approach taken in the 'Strategy' or 'Outcomes' sections of Proposed City Plan. That, in our view, has the significant potential to mislead stakeholders, particularly the wider public, and may therefore lead to people not making representations which they might otherwise have made.

Consultants 4-Consulting has been commissioned to consider the implications of the Proposed Plan's strategy for employment land. They provided an overview of the strategy and have highlighted that significant further assessment is required to fully understand the likely consequences. This is the kind of work that the Council should be obliged to undertake, but it has not been done in this case. As it says in Planning Circular 6/2013 'Development Planning':

"Evidence is required to inform plan-making, justify the plan's content, and provide a baseline for later monitoring. Information gathering and analysis should serve efficient high quality plan-making. Certain aspects of the evidence base (such as Housing Need and Demand Assessment, and transport appraisals) are likely to be essential at each plan review. Authorities should therefore take a proportionate approach and consider what is required, and where scarce resources can best be spent, to inform the particular issues being addressed in the plan. A robust evidence base will also be critical at any subsequent development plan examination."

Therefore, the Council should be encouraged to undertake a robust assessment of the Plan's 'economic strategy' prior to the Examination and provide the opportunity for stakeholders to comment upon it. It seems likely that the outcome of this assessment would confirm the view that the strategy will have significant negative consequences and should lead to a rethink of the decision not to allocate any additional greenfield land for development in the City. It is not clear whether Council will undertake this assessment and therefore objectors are considering whether to commission the work directly.

#### 4 Consulting Overview: Conclusions

Redeveloping industrial buildings to accommodate new housing is not simply a matter of matching the supply and demand of industrial land. The approach should consider the key role played by Edinburgh's industrial and related business sites in providing much needed jobs and income for some of the City's most deprived communities. This issue is not addressed in City Plan 2030. A fuller consideration of how competing demands could be better balanced is more likely to realise the ambition of a city where everyone shares in its economic success.

City Plan 2030 could leave Edinburgh as having the UK's most unbalanced economic employment base of any major city in the UK, moving ahead of London.

The proposals present clear challenges to the development of key Scottish Government policies, but their consequences have hardly been considered by the Council.

Wright PDL (0078)

There are several contradictions noted in the Plan and it is unclear how these are to be resolved. In particular, the need to support business versus the high percentage of new housing sites allocated on existing active business land.

Whilst the Council appears accepting of the need to meet more of its own housing need and demand within city limits, reducing the displacement of families to elsewhere in the region and in consequence increasing car commuting between Edinburgh and surrounding areas, it has on the other hand inadvertently planned for the mass displacement of the businesses currently occupying the newly allocated housing sites. It has not considered where these businesses will go and what the car travel impacts of their dispersal will be. The spatial strategy proposes the large-scale displacement of employment (particularly in industry), but there are no coherent plans for relocation in the city. Greenfield land would need to be released to accommodate the displacement, but that would defeat the Plan strategy not to allocate any new greenfield sites. The failure to meet housing targets will significantly accelerate housing costs in a city where affordability pressures are already pronounced.

Also, active employment sites would need to be purchased at existing use value, which in some cases could outstrip residential development value due to income in perpetuity versus residential value of land, thus some sites won't be viable to purchase. If any Council opts to CPO land, it needs to recognise that this may not be a wise financial decision to make.

It is not clear how the Council has satisfied itself that this approach is deliverable. This has not been provided in the narrative. There is a gap between the Council's aspirations, and what will be technically and financially achievable.

The Plan certainly does not support existing businesses. Representations submitted by several HfS members, indicates that the vast majority of sites proposed for housing are currently in active employment uses and that displacement of these is likely to have significant impacts on Edinburgh's employment base. In any circumstances, the Council has failed to justify this strategy or consider its consequences.

We are concerned at the level of displacement of businesses that currently occupy the newly allocated sites, which may lead to an increase in car dependence for some, as these businesses may well relocate to more peripheral areas. We object to the fact the Council has failed to properly consider this.

Economic factors will be impacted by the restriction of available homes, thereby restricting the available workforce. Furthermore, driving operational businesses away from the city will affect the economic resilience of the city.

It is unclear whether the Ryden Report (City of Edinburgh Council: Edinburgh Commercial Needs Study: Mixed Use Delivery – December 2020) has been considered. This report highlighted that the allocation of these sites for residential development would lead to a significant reduction in employment land and require a very active industrial development programme to reaccommodate even a proportion of this displaced activity. The report concluded that it was likely that larger users would continue to migrate to West Lothian and small/medium users to estates in East Lothian and Midlothian around the A720 City Bypass, as well as potentially to south Fife, as a result of the proposed allocation of these sites. How does this Policy assist with the aim of reducing the need to travel via/own a

car?

Furthermore, it appears the Council has not properly considered the economic/socio-economic/environmental impacts on the businesses and the moving out of these businesses. Without this, it is difficult for consultees or even the Council itself to fully understand the impacts of the spatial strategy, and therefore its appropriateness.

Finally, the businesses displaced as a result of the proposed housing allocations will likely need to relocate, and this could result in them moving to less sustainable areas. Has a relocation strategy been established to provide certainty that the relocation of these businesses will result in a fundamentally more sustainable land use and transport pattern?

#### Homes for Scotland (0404)

The Plan proposes to displace a significant number of active businesses so their current sites can be repurposed for housing development. Policy Econ 2 gives those displaced businesses the additional problem of having to also ensure 50% of their new site is also used for housing development. The Council has given no thought to how this programme of displacement and/or redevelopment will be delivered. Each and every site will need to be project managed by either a willing landowner, a willing home builder or the Council itself through the compulsory purchase process. It appears the Council has given no thought to which of those delivery methods will suit each of the sites it is expecting homes to be built on and/or businesses relocated to. If the existing businesses can't be re-provided for on their existing sites (which seems unlikely given the lack of detailed planning for this) then in all likelihood, this policy realises the Ryden report conclusion that existing businesses will have to relocate to areas outwith the city.

Furthermore, whilst the Council appears accepting of the need to meet more of its own housing need and demand within city limits, reducing the displacement of families to elsewhere in the region and in consequence increasing car commuting between Edinburgh and surrounding areas, it has on the other hand inadvertently planned for the mass displacement of the businesses currently occupying the newly allocated housing sites. It has not considered where these businesses will go and what the car travel impacts of their dispersal will be. The spatial strategy proposes the large-scale displacement of employment (particularly in industry), but there are no coherent plans for relocation in the city. Greenfield land would need to be released to accommodate the displacement, but that would defeat the Plan strategy not to allocate any new greenfield sites. The failure to meet housing targets will significantly accelerate housing costs in a city where affordability pressures are already pronounced.

Also, active employment sites would need to be purchased at existing use value, which in some cases could outstrip residential development value due to income in perpetuity versus residential value of land, thus some sites won't be viable to purchase. If any Council opts to CPO land, it needs to recognise that this may not be a wise financial decision to make.

It is not clear if the Council has satisfied itself that this approach is deliverable. This has not been provided in the narrative, and there is a gap between the Council's aspirations, and what will be technically and financially achievable.



Several of the newly allocated sites currently have a retail element. Policy Re 4 presumes against the conversion of shop units to residential use, and safeguards these for shopping and small business use. However, conversion to residential use could be supported where the shop unit has been vacant for a significant period of time and been actively marketed, where there is a local need and demand for a range of housing types and for town centre living. It is not clear how this requirement aligns with the allocation of these businesses for residential development. It is not clear if existing and operational retail premises that have been allocated will also be required to remain vacant for a “significant period” of time.

It is unclear whether the Ryden Mixed Use Delivery Report has been considered. This report highlighted that the allocation of these sites for residential development would lead to a significant reduction in employment land and require a very active industrial development programme to reaccommodate even a proportion of this displaced activity. The report concluded that it was likely that larger users would continue to migrate to West Lothian and small/medium users to estates in East Lothian and Midlothian around the A720 City Bypass, as well as potentially to south Fife, as a result of the proposed allocation of these sites.

Furthermore, it appears the Council has not properly considered the economic/socio-economic/environmental impacts on the businesses and the moving out of these businesses. Without this, it is difficult for consultees or even the Council itself to fully understand the impacts of the spatial strategy, and therefore its appropriateness.

#### J. Smart & Co. (Contractors) PLC (0483)

The Spatial Strategy has failed to make any provision for new industrial land which is essential in order to increase supply.

An alternative strategy must be pursued, one which identifies land for new industrial development in appropriate locations near to major transport links and available infrastructure.

Rather than a ‘brownfield only’ strategy this will require City Plan 2030 to adopt a blended approach that includes both brownfield and greenfield land for development.

The Spatial Strategy prioritises delivery of new homes on brownfield land. It identifies a number of ‘Major New Development Areas’ across the city which contain 95 new housing sites.

The majority of these sites are in active alternative use – primarily business and industrial land - and in private ownership.

As both an owner of a significant industrial land portfolio and a developer of industrial and residential property, the Spatial Strategy is fundamental to the interests of J.Smart & Co.

While supportive of aspects of the strategy there is a need to reconsider other matters if the City Plan is to achieve its stated aims and outcomes.

Unfortunately, the Proposed Plan has not identified any new business and industrial land to replace the industrial sites it seeks to repurpose for housing development. This is a

significant concern.

The lack of any such provision within the plan significantly undermines its overall strategy and will not support Edinburgh's economic or housing needs.

We note the findings of Ryden's 'Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market' which was commissioned to inform preparation of the plan.

The study identified continued high market demand for industrial property in Edinburgh set against a decline in available supply and take-up. In short, it concluded that a low supply of industrial land is constraining market demand.

In their assessment, with reference to the potential impacts of the plan's brownfield first strategy, Ryden noted:-

"The potential rate of stock loss is also 6 times the current, active rate of new industrial development in the city (largely in the west). The implication is that a very active industrial development programme would be required to re-accommodate even a proportion of this displaced industrial activity. More likely the migration of larger users to West Lothian and small-medium users (especially trades servicing the city) to the western estates in East Lothian and to north Midlothian around the A720 City Bypass, as well as potentially to south Fife, would continue, alongside the accommodation of some in new premises in Edinburgh. Some re-accommodation of non-industrial service uses in secondary retail frontages or business centres could also occur depending on individual occupier needs, particularly where those smaller businesses service the immediate residential and business populations and may not be able to stretch financially to a new-build industrial unit."

Proposed City Plan does not reflect these findings, and this is a crucial omission.

The plan's failure to make provision for an increased industrial land supply and, in turn, the re-accommodation of displaced industrial users undermines its overall aims and desired outcomes.

As a direct result, this will restrict the number of existing industrial sites that come forward for housing/mixed-use development while those industrial occupiers that are displaced by redevelopment will be pushed out of the city.

As a consequence both housing and industrial land supply and availability will be restricted, and City Plan 2030 will fail to address need and demand in either sector.

For these reasons J Smart & Co. do not support the Spatial Strategy of Proposed City Plan 2030.

It is considered that an alternative strategy must be pursued, one which identifies land for new industrial development in appropriate locations near to major transport links and available infrastructure.

Rather than a 'brownfield only' strategy this will require City Plan 2030 to adopt a blended approach that includes both brownfield and greenfield land for development.

West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352)

Proposed City Plan 2030 has not made any provision for the numerous businesses that would be displaced to facilitate successful implementation of the Spatial Strategy - what is the strategy for relocating these businesses in the absence of any new industrial land allocations within the Plan?

Has the Council considered circumstances where existing industrial use value is in excess of residential value and there is no financial logic in site owners obtaining vacant possession and selling for residential use? Factors such as 35% affordable housing provision and at least 20% of site area being usable open space will increase the potential for such circumstances to occur.

Cala Management (0316)

Proposed City Plan 2030 has not made any provision for the numerous businesses that would need to be displaced to facilitate successful implementation of the Spatial Strategy. Given there are no new industrial land allocations within the Proposed Plan, where does the Council propose these businesses relocate to? In the absence of any suitable alternative for these businesses, this will surely limit the number of brownfield sites that come forward for housing development.

The Spatial Strategy does not account for the findings of the 'Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market'. The Study identified high market demand for industrial property in Edinburgh but at the same time a decline in available supply and take-up of industrial property i.e. low supply levels are constraining market demand. The proposed repurposing of much of Edinburgh's existing industrial supply will compound this issue.

Edinburgh Chamber of Commerce (0379)

Understand the principles behind the spatial strategy as proposed in City Plan 2030, but have significant concerns about the displacement of businesses currently occupying the planned new housing sites.

The plan does not make provision for the relocation of c.400 businesses (mainly industrial) which would be directly impacted by the Plan. It does not seem to have considered where these businesses will go, what the impact on local employment and communities will be, and what the car travel impacts of their dispersal will be.

Would like to see more consideration in the Plan about how these issues will be addressed, what other options may be available to minimise impact both on their operations and the local communities they support, and what meaningful assistance will be made available to them to relocate to appropriate alternative spaces if this is the only option.

**Economic Strategy**

Steve Loomes (0767), Wright PDL (0078)

Policy Econ 1 (Supporting inclusive Growth, innovation and culture) sets out steps and

actions needed to enable good growth for Edinburgh's economy. The proposed loss of significant amounts of established employment land is contrary to this aim.

It is not clear if the Council has identified which current landowners and businesses will willingly clear/vacate employment sites in order to facilitate home building.

It is not clear if the Council has undertaken a cost analysis of voluntary or compulsory land purchase for those sites where it will be working against landowner and occupier preferences.

The Council has given no thought to how this programme of displacement and/or redevelopment will be delivered. Each and every site will need to be project managed by either a willing landowner, a willing home builder or the Council itself through the compulsory purchase process. It appears the Council has given no thought to which of those delivery methods will suit each of the sites it is expecting homes to be built on and/or businesses relocated to. If the existing businesses can't be re-provided for on their existing sites (which seems unlikely given the lack of detailed planning for this) then in all likelihood, the Ryden report conclusion that existing businesses will have to relocate to areas outwith the city will be realised.

If any Council opts to CPO land, it needs to recognise that this may not be a wise financial decision to make. It is not clear if the Council has satisfied itself that this approach is deliverable. This has not been provided in the narrative, and there is a gap between the Council's aspirations, and what will be technically and financially achievable.

#### Barratt David Wilson Homes (0677)

The Council has given no thought to how this programme of displacement and/or redevelopment will be delivered. Each and every site will need to be project managed by either a willing landowner, a willing home builder or the Council itself through the compulsory purchase process. It appears the Council has given no thought to which of those delivery methods will suit each of the sites it is expecting homes to be built on and/or businesses relocated to. If the existing businesses can't be re-provided for on their existing sites (which seems unlikely given the lack of detailed planning for this) then in all likelihood, the Ryden report conclusion that existing businesses will have to relocate to areas outwith the city will be realised.

If any Council opts to CPO land, it needs to recognise that this may not be a wise financial decision to make. CPO of land cannot be relied upon to deliver the required housing sites. There is a high probability that the CPO procedure of an existing employment site will result in a Public Inquiry (triggered if there is only one objection); not to mention protracted discussions on the value of the site between the landowner and the district valuer, which may ultimately also result in a Lands Tribunal Inquiry. The Council should evidence the timescale and overall cost relating to the acquisition of the identified sites.

It is not clear if the Council has satisfied itself that this approach is deliverable. This has not been provided in the narrative, and there is a gap between the Council's aspirations, and what will be technically and financially achievable.

The Council's Economy Strategy sets out steps and actions needed to enable good growth for Edinburgh's economy. BDW considers the proposed loss of significant

amounts of employment land to be wholly contrary to this aim.

#### Scottish Property Federation (0144)

This section (Paragraph 3.238) fails to recognise the urgent need for reinvestment in the industrial and distribution sector. In their latest annual review, Ryden have reported that much of the existing stock is old, on average forty years old. This stock will need refurbishing and possibly even entirely replacing. There is also an under-supply of existing premises or effective sites that will add to upwards rental pressures in the near term. In addition, the challenge of large scale relocation of existing businesses from their current premises will mean that new sites will need to be found before additional supply of much needed industrial sites. The plan needs to meet the growth in demand for industrial sites and distribution of goods from the online economy. At the same time the city will need to recognise the impact of relocation from other employment sites as land is reallocated for housing. Neither of these factors are represented under Econ 4 as it now stands.

The strategy for achieving affordable housing targets (Paragraphs 2.93, 2.103 and 2.110) through use of CPOs on employment land sites is not likely to achieve the stated targets within the intended timescales. CPOs are a resource intensive and uncertain process, especially where land is in existing use and occupied.

We disagree with this section (paragraphs 2.142 to 2.148) of the plan because it does not, we believe, fully represent several economic challenges including the requirement for industrial/logistics sites across the city. First, there has arguably been an historic under-investment in industrial/logistical premises within the city, with many industrial or logistical businesses instead being sited in Livingston and other regional locations. With the growing emphasis upon distribution we feel there should be more focus on supporting logistics across the city. Instead, industrial sites are to be subject to CPO for housing, so the city will need to find alternative sites within its boundaries for these dislocated businesses before seeking to grow the distribution economy.

The Plan does not appear to appreciate the scale of challenge for retail and leisure in the first half of the plan period, as the city recovers from the Covid-19 pandemic. The plan should not overlook the need for the city to be able to support the experience economy, which Edinburgh is particularly dependent on. This will need significant reinvestment in the city centre as well as the towns. This will depend upon attracting investment and development capital not just from the wider UK, but internationally yet the wider plan requirements for significant contributions to housing and affordable housing, as well as other social infrastructure, will inhibit the appeal of Edinburgh to investors. Simply put, the investment case for many forms of development are already finely balanced and the addition of housing to most forms of commercial development, including student accommodation and the nascent build-to-rent sector, will be a potential barrier to much needed commercial investment.

#### The Royal London Mutual Insurance Society Ltd (0149)

Use of compulsory purchase powers:

CPOs entail lengthy and complex procedures. Their use has implications for businesses, the Council and the delivery of the Proposed Plan's strategy. The key issues are summarised below with further detail provided in supporting document.

The proposed use of CPO is further complicated in this instance by the fact that the Plan contemplates using it to acquire land used by operational businesses. Where there is lack of alternative provision and businesses are forced to close, the Council could be required to buy the whole businesses valued as a going concern not just premises. This could add significantly to the costs of CPO, which is already an expensive process. Timing of compensation payments may also be challenging for the Council or any other acquiring authority. Advance payments to some interests may be payable while other matters are unresolved, potentially requiring significant payments well before development begins let alone yields any income.

As a publicly funded body the Council will also have to have regard to obtaining best value for the money it does spend. The money and officer time spent running multiple contentious CPOs simultaneously will have a significant opportunity cost and in any case would likely be prohibitive. It would also appear questionable whether pursuing development on such costly and complex sites, with the attendant disruption to businesses, would be the best use of the Council's finances when other options could be made available such as allocating more unconstrained sites.

There is a lack of evidence to support the Plan's proposed approach to redevelopment of land including employment (mainly industrial) land to satisfy the requirement for housing.

The Plan is not supported by background papers which consider the impact of its strategy on established employment and business uses. A 'Edinburgh Commercial Needs Study: Mixed Use Delivery (ECNS)(December 2020)' has been undertaken by Ryden on behalf of the Council.

This document is relevant to the Plan, but it is not clear to what extent it has informed the Council's approach. It is not referred to in the Plan which just refers to the 4 reports available at the MIR stage in paragraph 2.143.

Ryden's Mixed Use Delivery Report updates their 2018 Commercial Needs Study: Industrial Property Market Report which accompanied the MIR and considers the potential impact of Choice 12 (A) / Option 1 of the MIR which proposed the redevelopment of existing brownfield industrial sites for residential-led development to support the City's housing requirements.

It observes that the industrial occupier base is diverse and includes a wide range of trades and services. It cites the example of a small multi-let industrial estates in Granton as a typical reflection of occupier type 'providing a range of urban goods and services' typical of Edinburgh's multi-occupied industrial estates (p9).

The industrial market is considered to perform well with strong demand for modern space, smaller units and on managed industrial estates. The study suggests that limited supply may be suppressing or displacing demand, particularly for smaller units below 5,000 sq ft.

The Report concludes that 56 sites in scope for redevelopment as part of the strategy account for 30% of the City's industrial stock. The Report provides a general assessment of stock.

The implications for the industrial market of progressing with the brownfield strategy are identified in the Report and are significant.

The Report makes some key observations:

- Proposed loss of stock is skewed towards the north east of the City(p30) and new stock has been developed only in the west of the City (p15).
- 30% of the 30,000 jobs supported by industrial stock could be affected, noting the number could be lower as vacancy rates in the affected stock are 13% compared to the market figure of 5.6% (p30).
- Not all industrial stock identified for redevelopment is of a poor standard – there are exceptions where stock is well suited to market needs, is full and popular (and attracts high rents (p30).
- In assessing the impact on the Bonnington area, the Report cautions that there will still be an overall loss of job numbers and services from the area and that this should be balanced against the residential and economic impact of new residents in the area (p40).
- The case studies demonstrate that policy requirements to replace employment uses on site are tending to yield only a small number of flexible small units, some of which are designed to convert to flats if they do not attract tenants, and are thus unlikely to contribute to the replacement need if industrial stock is lost at the potential rate indicated in this report (p43).

The Strategy fails to recognise that:

- The industrial market services the demands of the local urban market;
- The market is performing well with limited supply potentially suppressing or displacing demand, particularly for smaller units;
- The strategy represents redevelopment of 30% of the City's industrial stock including premises such as Royal London's which is modernised and well suited to market needs, full, popular and achieve high rents;
- Jobs would be lost and businesses would be displaced beyond the City;
- The potential loss of around 250,000 sq.ft. of industrial space annually to 2030 which is around five times the historic rate of stock loss;
- The potential stock loss rate around six times the current, active rate of new industrial development; and
- A very active industrial development programme would be required to reaccommodate even a proportion of this displaced activity.

The strategy also ignores Ryden's advice in their 2018 Report (see Appendix 2 MIR response) on two counts:

- Understand the nature of the occupiers to be accommodated, and their related needs for locations and types of premises.
- Market intervention to protect or allocate sites and support provision of serviced sites may be required.

#### Tarmac (0244)

The linkage between housing and employment markets is poorly defined in the Proposed LDP. Bairdview is directly adjacent to West Edinburgh and can contribute to the success of this strategy by delivering a sustainable local housing development providing a local workforce.

The Council has underestimated employment land needs and this is being further undermined by the Council's proposal to utilise such allocated for housing. There appears to be no alignment with the Choices Report on strategic sites such as IBG. Furthermore, the approach taken appears to be contrary to the Ryden Report - Commercial Needs Study: Mixed Use Delivery. Displacement of business from urban land and the restriction for major employers on economic development land will further displace economic activity to neighbouring areas.

#### Hallam Land Management (0615)

The economic development strategy contained within the Proposed LDP requires to be completely reviewed as it is already out of date in terms of its information base (Ryden Commercial Needs Study). There is an overreliance on a limited number of areas and sectors which are expected to cater for a rapidly growing population. Little emphasis is given to the economic value of housebuilding.

Assumptions made in relation to commercial needs are too broad brush and unrelated to any assessment of local needs and demands or aligned with 20-minute neighbourhoods which would make locations such as Craigiehall sustainable, reducing commuting by car.

The Council's Economic Strategy seeks sustainable growth through investment in jobs – focussing on development and regeneration, inward investment, support for businesses and assistance to the unemployed. It is acknowledged that City Plan has a key role in helping to deliver this strategy, but this is being done in the absence of strategic or regional targets. In addition, the baseline studies for the Plan relating to commercial and industrial growth are now significantly out of date and pre-Covid. As a result, it is likely that employment patterns in different sectors will have changed in the interim.

There is as yet no evidence that less commercial / employment space will be required during the plan period as has been assumed in relation to the International Business District and Bio- Quarter where space has been substituted by homes. This is not consistent with the LDP strategy or its vision for West Edinburgh.

The LDP is not consistent with the Ryden Commercial Needs Assessment. Whilst this now requires review it warns against the loss of employment land.

City Plan 2030 undertakes to provide development opportunities for 'good growth' and to provide land for all types of businesses – big and small – whether they are office based or require industrial units, or as part of mixed-use development as well as protecting local centres that local retail, leisure and community services for residents.

#### Hallam Land Management (0599), Miller Homes Limited (0649)

The Council has accepted that the likely conclusion from the proposed development strategy is that the use of compulsory purchase powers (CPO) will be required. However, the Council has produced no evidence to demonstrate that its strategy can be delivered despite the Council's acknowledgement in the MIR consultation that the preferred strategy may not be financially viable for the Council and its partners to deliver or, possible for the Council to achieve an annual delivery rate to prevent the release of further green belt land. If CPO is required then the costs, including market value and disturbance



compensation, as well as the timescales of that process along with a strategy for the relocation of businesses that would be displaced should have been presented and explained before the Planning Committee as it approved the Proposed LDP for the representation period. Without this information, it is not possible to fully scrutinise and respond to the proposed development strategy. That undermines the representation period and is unfair to parties making representations.

The Proposed LDP is not supported by a background document that addresses the impact on the loss of the economic or employment land supply for pursuing the proposed development strategy the Proposed LDP is silent on the impact of mixed use housing proposals on the economic sites identified as part of SESplan Policy 2 Supply and Location of Employment Land.

#### Homes for Scotland (0404)

Policy Econ 1 (Supporting Inclusive Growth, innovation and culture) sets out steps and actions needed to enable good growth for Edinburgh's economy. The proposed loss of significant amounts of established employment land is contrary to this aim.

It is also worth noting the contribution that house building itself makes to the local economy, including in terms of creating and supporting jobs.

It is not clear if the Council has identified which current landowners and businesses will willingly clear/vacate employment sites in order to facilitate home building. It is not clear if the Council has undertaken a cost analysis of voluntary or compulsory land purchase for those sites where it will be working against landowner and occupier preferences.

#### West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352)

The Spatial Strategy does not account for the findings of the 'Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market'. The study identified continued high market demand for industrial property set against a decline in available supply and take-up of industrial property – indicative of low supply constraining market demand. The Spatial Strategy's repurposing of much of Edinburgh's existing industrial supply will compound this issue, particularly as there are no new business and industrial land allocations within Proposed City Plan.

The success of the Proposed Plan's Spatial Strategy is reliant on a range of commercial factors outwith the Council's control. Recognising this, Choices for City Plan acknowledged the proposed approach "may not be financially viable" and would "require a significant CPO programme to ensure land comes forward."

The need for compulsory purchase is again referenced within Proposed City Plan 2030. Paragraph 2.103 states "use of compulsory purchase powers to facilitate development may be needed." Paragraph 3.176 states "On sites in private ownership the Council will, where necessary, intervene to ensure that land comes forward utilising compulsory purchase powers if required".

Given the limitations in both Council owned land supply and the potential to acquire sites on the open market it is clear that, to deliver the Spatial Strategy, use of compulsory purchase powers may need to be extensive.

This cannot be considered a robust or reliable basis upon which to underpin delivery of the plan's Spatial Strategy. Has the Council undertaken detailed cost analysis to understand the implications of pursuing compulsory purchase contrary to landowner intentions? Has the Council taken the advice of the District Valuer to establish land values associated to its brownfield/CPO strategy?

West Craigs Ltd instructed Savills to consider the values paid for existing industrial stock and investments within Edinburgh and whether this underlying value will be an impediment to the Council's strategy (having regard to the value of residential land). Savills specialist Compulsory Purchase Team also provided comment on the practicalities of implementing the Council's strategy, and the likely costs should CEC exercise their CPO powers to obtain vacant possession of provisionally allocated residential sites currently in industrial use. Savills findings are presented within the submitted Recommendations for Housing on Multi-Let Industrial Sites report.

The Savills report identifies that, were CEC to implement CPO powers this would be costly, time consuming and involve a high degree of risk of being successful. Using a number of case studies as a basis for their analysis, the report notes that if the Council were to use its CPO powers to acquire existing active industrial land they would most likely need to pay ahead of existing headline residential land values to assemble sites. Such a strategy appears commercially unviable and raises questions as to how this could be supported by the public purse.

#### CALA Management Ltd (0465)

If any Council opts to CPO land, it needs to recognise that this may not be a wise financial decision to make. CPO of land cannot be relied upon to deliver the required housing sites. There is a high probability that the CPO procedure of an existing employment site will result in a Public Inquiry (triggered if there is only one objection); not to mention protracted discussions on the value of the site between the landowner and the district valuer, which may ultimately also result in a Lands Tribunal Inquiry. The Council should evidence the timescale and overall cost relating to the acquisition of the identified sites.

It is not clear if the Council has satisfied itself that this approach is deliverable. This has not been provided in the narrative, and there is a gap between the Council's aspirations, and what will be technically and financially achievable.

#### Lord Dalmeny (0475)

The Strategy should confirm the number and total acreage of brownfield sites identified for redevelopment that do not comprise part of the established vacant or derelict supply in the city, but instead remain as operational sites, occupied by either by business and industrial uses or for any other purpose.

The Strategy should subsequently confirm the quantum of currently operational employment land that will be displaced in order to facilitate the focus on re-use of 'brownfield land' to achieve the aims of the strategy as regards prioritising use of brownfield over greenfield land.

The Strategy should then set out how much additional employment land will be required to accommodate the businesses that are currently occupying land earmarked in the Plan as 'brownfield redevelopment' sites to facilitate new housing and community uses; a strategy to accommodate these displaced business needs to be included in explicit terms.

To clarify this information, a new paragraph or paragraphs should be added after para 2.2, point 2, on page 8 of City Plan 2030 to address each of the points above.

The Strategy fails to recognise that a significant proportion (perhaps as much as 95%) of the brownfield land that is proposed to be redeveloped for housing purposes is currently occupied by other uses – those uses include many productive businesses whose local communities depend on their presence for employment. The Environmental Report confirms that Edinburgh has a relatively low incidence of vacant and derelict land compared with other Central Belt authorities.

The spatial strategy the Council proposes to adopt as regards delivery of housing may require higher levels of intervention than might be the norm; this reference relates to the potential requirement to use compulsory purchase powers to acquire currently occupied 'brownfield sites' to facilitate development. This is both a costly and time consuming process which is unlikely to deliver timeous supply of housing land.

The Plan does not appear to include a robust strategy to facilitate relocation of businesses displaced from their current location in order to deliver the 'brownfield first' approach. We suggest that the LDP is therefore not consistent with the Commercial Needs Assessment 2020 prepared in support of the Choices for City Plan consultation; whilst the assessment now requires review to capture changes in working patterns post Covid-19 one of the key messages therein warns against the loss of employment land and we suggest this remains a very valid issue.

This issue is amplified by a requirement under Housing Delivery policies for all sites identified that come forward for commercial development to provide housing as part of the scheme, where such proposals are compatible with other policies in the plan.

The cumulative impact of these aims has the potential to frustrate the delivery of future business and industrial land supply across the City as there is currently a complete lack of clarity surrounding the total quantum of employment land development that will be required, or indeed can be achieved, during the Plan period. Strategy is deficient in not directly addressing this matter and that there are opportunities available to identify a generous supply of employment land across the Plan area in order to meet the future needs of displaced business and industrial operators.

We suggest that the Council should adopt a similarly generous and flexible approach to enable additional employment land to come forward for development as it does to the identification of land to meet housing supply targets; in this instance this would equate to a generosity allowance of 20% over and above the current quantum of identified land for employment development. This target could be met on sites either within or adjacent to the urban area that are not constrained by physical, environmental or ownership issues and which are not in locations that contribute to the landscape setting of the city.

We note, for example, that the Council has taken steps to include an area of land to the west of Newbridge (north of the M8) within the urban area as an extension to the

settlement's Business and Industry Area; to the best of our knowledge this land was not promoted for development through the Choices for City Plan consultation.

There are other sites located in close proximity to existing strategic employment locations that have potential to facilitate additional employment development, thereby offering additional options to accommodate businesses displaced as part of the 'brownfield first' strategy.

The Commercial Needs Study undertaken to inform the Choices for City Plan consultation confirms that the National Planning Framework supports further development of industrial space at a strategic level and highlights that the waterfront in Edinburgh is a key area for regeneration, new homes and port, energy and industrial development. It also confirms that West Edinburgh is a significant location for investment. The study also highlighted that demand is increasingly directed towards strategic locations with good transportation links on the edge of urban Edinburgh.

As a result, the study confirms that unlocking new industrial development sites in these strategic locations around Edinburgh is important not only to meet current demand, but because inner city, older industrial estates with poorer buildings, accessibility and layouts are under constant pressure for redevelopment for alternative uses.

#### Taylor Wimpey East Scotland (0770)

Proposed City Plan 2030 appears not to have made any provision for the numerous active and functional businesses that would be displaced to facilitate successful implementation of the Spatial Strategy:

- What is the Council's strategy for relocating these businesses and how does this support the wider 'sustainability' aspirations which underpin their 'brownfield first' approach?
- Has the Council considered circumstances where the current industrial use value of the land is in excess of the residential value and there is no financial logic in the site owners obtaining vacant possession and selling for residential use?

The Spatial Strategy does not account for the findings of the 'Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market' which was commissioned to inform preparation of City Plan 2030.

The Commercial Needs Study identified high market demand for industrial property in Edinburgh whilst noting a decline in available supply and take-up of industrial property i.e. low supply levels are constraining market demand. The Spatial Strategy's suggested repurposing of much of Edinburgh's existing industrial supply will compound this issue, particularly given the lack of any new business and industrial land allocations within the Proposed Plan to replace what would be lost.

It is clear the success of the Proposed Plan's Spatial Strategy is reliant on a range of commercial factors that are not within the Council's control. Recognising this, the Choices for City Plan consultation document acknowledged that the proposed approach "may not be financially viable" and would "require a significant CPO programme to ensure land comes forward."

The need for compulsory purchase is again referenced within Proposed City Plan 2030. Paragraph 2.103 states “use of compulsory purchase powers to facilitate development may be needed.” Paragraph 3.176 states “On sites in private ownership the Council will, where necessary, intervene to ensure that land comes forward utilising compulsory purchase powers if required”.

There are obvious limitations in terms of both Council owned land supply and the potential to acquire private sites on the open market. Therefore, to deliver the Spatial Strategy as proposed, use of compulsory purchase powers may need to be extensive.

This cannot be considered a robust or reliable basis upon which to underpin delivery of the plan’s Spatial Strategy - has the Council undertaken detailed cost analysis to understand the implications of pursuing compulsory purchase contrary to landowner intentions? Has the Council taken the advice of the District Valuer to establish land values associated to its brownfield/CPO strategy?

#### Rosebery Estate (0618)

It is not clear whether the Ryden Report (City of Edinburgh Council: Edinburgh Commercial Needs Study: Mixed Use Delivery – December 2020) has been considered. This report highlighted that the allocation of these sites for residential development would require a very active industrial development programme to reaccommodate even a proportion of this displaced activity. The report concluded that it was likely that larger users would continue to migrate to West Lothian and small/medium users to estates in East Lothian and Midlothian around the A720 City Bypass, as well as potentially to south Fife, as a result of the proposed allocation of these sites. How does this Policy assist with the aim of reducing the need to travel via/own a car?

Furthermore, it appears the Council has not properly considered the economic/socio-economic/environmental impacts on the businesses and the moving out of these businesses. Without this, it is difficult for consultees or even the Council itself to fully understand the impacts of the spatial strategy, and therefore its appropriateness. One of the Plan’s key aims is to deliver policies which support businesses to thrive. This appears to contrast with the Council’s settled view on the location of housing moving forward.

Finally, the businesses displaced as a result of the proposed housing allocations will likely need to relocate, and this could result in them moving to less sustainable areas. Has a relocation strategy been established to provide certainty that the relocation of these businesses will result in a fundamentally more sustainable land use and transport pattern?

#### Landowner of East Foxhall (0544)

The Council further acknowledges at paragraph 2.103 of City Plan that to deliver their brownfield strategy, that CPO powers may be required. CPO is a lengthy and costly process, and we have concerns that if CPO is required, these sites will not be deliverable within the plan period. This is clearly contrary to paragraph 119 of SPP which states “Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period”.

The need to even recognise a potential requirement to utilise CPO powers clearly demonstrates that the Council are questioning the deliverability of the sites within the plan to achieve the housing numbers required, particularly in the latter years of the plan once the existing greenfield allocations are progressed. To address the above, it is clear that further sites, likely greenfield in nature, such as land at East Foxhall, should be allocated to ensure housing targets can be met.

In regards to the delivery of brownfield sites, a large proportion of sites identified by the Council for housing are currently within current and active employment use, likely with operators working to a business plan which may not include opportunities for relocating their premises.

It is also unclear as to whether all brownfield sites have been promoted by landowners, or that they are willing to sell. If either of these is not the case, it is questionable whether all of these sites will be able to come forward for delivery within the plan period, even with the CPO powers which the Council have already acknowledged might be required.

#### Cala Management (0316)

The Proposed Plan's Spatial Strategy is reliant on numerous commercial factors that are not within the Council's control. Recognising this, the Choices for City Plan consultation document acknowledged that the proposed approach "may not be financially viable" and would "require a significant CPO programme to ensure land comes forward." No evidence has been presented by the Council to assess the financial implications of such a significant CPO programme and how these existing businesses will be supported in relocating within the City.

The need for compulsory purchase is again referenced within Proposed City Plan 2030. Paragraph 2.103 states "use of compulsory purchase powers to facilitate development may be needed." Paragraph 3.176, in support of Policy HOU1 Housing Development, states "On sites in private ownership the Council will, where necessary, intervene to ensure that land comes forward utilising compulsory purchase powers if required".

There are obvious limitations in terms of both Council owned land supply and the potential to acquire private sites on the open market. Therefore, to deliver the Spatial Strategy as proposed, use of compulsory purchase powers would need to be extensive. This cannot be considered a robust or reliable basis upon which to underpin delivery of the plan's Spatial Strategy.

#### Forth Ports (0496)

FP object to the use of Compulsory Purchase Order Powers (CPO) to deliver the Council's brownfield housing delivery strategy. The potential for their use in relation to the Port of Leith, which is wholly owned and controlled by FP, would have serious and permanent implications for the Port.

Forth Ports Ltd is a port infrastructure organisation and will continue to operate as such, utilising its land holdings for port related uses, unless it considers any land within its ownership is no longer required for operational use. FP is also the Statutory Harbour Authority and the Competent Harbour Authority for the Firth of Forth and performs a number of functions as prescribed by legislation (Forth Ports Authority Order Confirmation

Act 1969) including overseeing of safety of navigation and licencing of all works below MHWS between the tidal limits inland and the mouth of the Firth. They operate the Forth and Tay Navigation Service which controls vessel movements on the Firths of Forth and Tay. In accordance with the Confirmation Act, FP also put in place byelaws to protect the health, safety and security of both operators and members of the public within its operational estates. They also have a duty to ensure port facilities are securely protected in accordance with International Ship and Port Facility Security (ISPS) code.

The Port of Leith is the City's port and has been so for centuries, adapting to the City's needs over time. It is the largest enclosed deepwater port in Scotland. It is a resource which the City must take care to nurture, as it provides port infrastructure which cannot be easily replicated. As well as being the City's Port, which provides full modern docking and cargo handling services for a range of operations, vessels, cargoes, it also performs a wider strategic role:

- At a National level, it supports essential actions to address the climate change emergency including supporting the off-shore renewables industry, which is recognised by national policy; and
- At a City Region level, it supports a range market requirements.

Port operations can broadly be described as operations which relate to shipping and activities related to handling associated passengers and goods. These are largely industrial in nature. By their association with shipping, port operations can only take place in a port. The transitional nature of port activities requires port operators (including their agents and lessees) to handle, store and process different commodities in a flexible manner. The associated development requirements are permitted in accordance with Class 35 of The Town and Country Planning (General Permitted Development) (Scotland) Order 1992, as amended. Forth Ports are seeing increases in demand for its infrastructure services and support for Use Classes 4, 5 and 6 is required to fully address its potential.

The proposed Plans' commitment to the use of Compulsory Purchase Powers has the potential to undermine the City's fabric, including the Port of Leith, which has developed and adapted over centuries. In seeking to address the need for housing, the proposal fails to recognise the wider impact and implications for the City's economy and infrastructure.

#### Leith Central Community Council (0614)

Paragraph 2.2.2, Directing new development to, and maximising the use of, brownfield land rather than greenfield land. The definition of brownfield (p198) can be interpreted as a self justifying condition for demolishing any non residential building in an urban area as it has no timescale associated with the terms redundant or unused . Are forced-closed industrial premises defined as brownfield?

#### Stoddart Family (0749)

The delivery of new homes and employment opportunities, whilst retaining employment land in sustainable locations must be a consideration for the plan. The Council has outlined a 'brownfield' only approach to the provision of housing and a number of locations are proposed for housing which have existing businesses located on them. However, there is no provision for the relocation of these businesses and the Council's own supporting information to the plan, the Ryden report into mixed-uses, states that many of these businesses may relocate out of the area.

## **Modifications sought by those submitting representations:**

### **Business Impacts**

BDW Trading (0350), Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495), J. Smart & Co. (Contractors) PLC (0483)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development.

J. Smart & Co. (Contractors) PLC (0483)

Modify the Plan to identify more land for new industrial development.

Hallam Land Management (0615)

Modify the plan's strategy to identify new housing allocations and neighbourhoods in sustainable locations such as Balerno.

Homes for Scotland (0404), Stirling Developments Limited (0303), Dandara East Scotland (0757), Steve Looms (0767), Barratt David Wilson Homes (0677), Hallam Land Management (0599), Stewart Milnes Homes (0118), Wright PDL (0078), CALA Management Ltd (0465), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Cala Management (0316), Steve Loomes (0767), Taylor Wimpey East Scotland (770)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development.

Scottish Property Federation (0144)

Modify plan to identify new business sites for relocated businesses before identifying additional supply of industrial sites.

Framework (Edinburgh) Limited (0743)

No modification identified.

Edinburgh Chamber of Commerce (0379)

Modify Plan to give more consideration to the impact on businesses of the spatial strategy and their relocation.

### **Economic Strategy**

Steve Loomes (0767), Barratt David Wilson Homes (0677)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development.



Wright PDL (0078)

Modify plan. A greater volume and range of land is required to be allocated for residential development, particularly in areas that are accessible, and do not result in the displacement of existing operational businesses.

Scottish Property Federation (0144)

Modify the Plan to allocate new sites for the industrial and distribution sector.

The Royal London Mutual Insurance Society Ltd (0149)

Plan should be modified to identify the Royal London's land holding at Seafeld Way as Business and Industry under Econ 4.

Tarmac (0244)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development.

Hallam Land Management (0615)

Modify plan to allocate land at Craigiehall which contains serviced employment land.

Hallam Land Management (0599)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development. This is dealt with under Issue2 Spatial Strategy

Miller Homes Limited (0649)

Modify Plan to allocate land at South of Lang Loan for housing development

Lord Dalmeny (0475)

Modify plan by adding paragraphs after 2.2, point 2 to address the following;

- Number and acreage of brownfield sites identified for redevelopment that are not part of the established vacant and derelict land supply and are operational sites.
- Confirm the quantum of current operational employment land that will be displaced.
- Set out how much additional employment land will be required to accommodate the businesses that are currently occupying identified brownfield sites.
- Set out a strategy to accommodate these displaced business needs in explicit terms.

Modify plan to allocate land to north of Lennymuir at Turnhouse road for business and mixed use offering.

Rosebery Estate (0618)

Modify plan by allocating sites at Bankhead Steading for mixed use and Lennie Cottages

for housing.

Landowner of East Foxhall (0544)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development including site at East Foxhall.

Cala Management (0316)

Modify the plan's strategy to promote a 'blended' approach of green and brownfield development including site at Currievale.

Forth Ports (0496)

Modify Plan as follows;

Remove provision for compulsory purchase from paragraphs 2.103 (p28) and 2.110 (p29) and paragraph 3.83 (p101) which supports policy ENV 2

2.103 - delete sentence 4 which reads, "...The Council has also acknowledged that use of compulsory purchase powers to facilitate development may be needed."

2.110 - delete the following text from the second sentence, "... and the use of compulsory purchase powers where necessary."

3.86 - delete the last sentence of the paragraph which reads, "Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces. In some cases, it may be necessary for the Council to use its powers of compulsory purchase to assemble a site for development and enable a satisfactory outcome to be achieved."

Leith Central Community Council (0614)

No modification specified

Stoddart Family (0749)

Modify the Plan to allocate land at Baberton Road for housing development.

**Summary of responses (including reasons) by planning authority:**

**Business Impacts**

BDW Trading (0350)

The Council sets out the justification for its approach of directing new development to and maximising the use of brownfield land rather than greenfield land under Issue 2: Spatial Strategy.

The Council considers the displacement of businesses is not as significant or extensive as alleged in the representations. The Plan identifies sites H62 and H63 in west Edinburgh for a high density mixed use urban extension. These sites, along with IBG phase 1 (Map 25 of the Plan), were previously identified as the International Business Gateway (IBG) in the adopted Local Development Plan (LDP) (CD039). This area continues to be identified as a strategic business centre and an area of economic importance, reflecting the aim of

the Plan to bring forward a mixed use urban extension rather than a housing only allocation. As the West Edinburgh area sites and the Edinburgh BioQuarter site are identified for mixed use development, it is clear that the overall intention of the strategy is to retain existing businesses uses where relevant and feasible.

Policy Place 16 covers West Edinburgh, and as stated in para 3.55 the City Plan continues to support economic development opportunities whilst introducing a balanced mix of uses that promote healthy lifestyles and a strong sense of place. To assist in the delivery of this approach the Plan sets out a series of development principles and an indicative layout on Map 24. Development Principle o specifically covers the mix of uses. Proposals are also expected to conform with a West Edinburgh Master Plan to be prepared to guide mixed use development. Although most of the land identified in West Edinburgh, sites H62 and H63, is currently greenfield it was allocated previously by the Edinburgh LDP. The intention of the Plan is to re-envisage the area, its form, and its mixture of uses with a focus on place making, sustainability, connectivity, biodiversity and strong landscape framework. One site (site H61) is part of the former emergency runway, however, it is now redundant and will have no impact on the functioning of the airport. Therefore, development of these sites will not result in active displacement of existing businesses and will provide for a range of new commercial, business and employment uses.

Where sites in West Edinburgh are in current business use, for example sites H59 and H60, the intention of the plan, as stated, is to deliver mixed use development in accord with the development principles set out in the Plan. With regard to the Edinburgh BioQuarter, the Plan sets out its Policy in Place 31. It is important to stress than the Plan similarly supports mixed use development on this site as set out in criterion b. In addition, none of the existing uses within the existing BioQuarter site will have to relocate as a result of the Plan's strategy. Instead the plan envisages a broader mix of uses on the remaining undeveloped parts of the site to support existing and future Life Science research and related commercial developments. Therefore, the Council does not agree that the Plan's proposals in this context will result in large scale displacement of businesses requiring their relocation.

The Plan is in accord with SDP Policy 2: Supply and Location of Employment Land. The policy states; *"Local Development Plans will support the delivery of the quantity of the established strategic employment land supply as identified below. Local Development Plans should also ensure that this provides a range and choice of marketable sites to meet anticipated requirements. The development of mixed communities (with residential and compatible employment opportunities jointly provided) on strategic employment sites may be appropriate provided this is justified through an LDP and does not result in a net loss to the overall strategic land supply."*

The figure identified for Edinburgh is 186ha. The Plan continues to identify 1802ha of land for employment purposes across Edinburgh as shown in the Appendix to Issue 3 (CD144) through a range of sites in various locations. Although 46ha of land has been taken up since the SDP was approved there is still 144.5ha of vacant employment land available for this type of development, which demonstrates that the requirements of SDP Policy 2 have and are continuing to be met. 483ha out of the 1675ha of land is also identified on the Plan's Proposals map as 'Business and Industry Area', and is protected from loss to alternative uses under Policy Econ 4, as shown in Appendix to Issue 3 (CD144). Policy Econ 4 Business and Industry Areas, supports their use for business, industrial or storage

uses. The policy has a presumption against changes of use on these sites which results in loss of these uses. In addition, SDP Policy 2 does allow the development of mixed communities on strategic employment sites where this is justified through an LDP. Therefore, the policy is also supportive of the re-envisioned mixed use development in West Edinburgh. As a result, the Council does not agree the Plan is contrary to the terms of the SESplan SDP with regard to Policy 2.

The proposed brownfield development sites identified within the Plan which currently have business/employment uses on them are being allocated for mixed use housing led development and not just housing development, which is a fundamental part of the strategy. Of the sites allocated in the Plan for mixed use housing led development only a small proportion (16%), are in active use as industrial sites/workshops as demonstrated in Appendix to Issue 3 (CD144) i.e. uses that may be incompatible with residential use. The rest of sites are either uses that are compatible with a residential environment or are open space/vacant/car parks. There have been no objections from landowners of the industrial estates and only 5 occupiers, out of the 2758 units, have objected which is a very small percentage of the number of units.

Most of these sites already fall within the existing Urban Area as identified on the Proposals Map of the existing adopted LDP (CD039). None of them fall within the 'Business and Industry Area' as defined in the adopted plan (or in other words they are not allocated employment sites), and therefore are not afforded any protection from change of use under Policy Emp 8 of the adopted plan. As a result, they are subject to Edinburgh LDP Policy Emp 9 Employment Sites and Premises. This policy allows such sites to be redeveloped for other uses including residential development subject to three criterion. Only one of the criterion in the adopted plan refers to mixed uses, which states that where a site is larger than 1ha there is a requirement to include floorspace for a range of business users and a further reference to this is included within paragraph 218. Of the 15 industrial estates/workshops allocated in the Plan eight are smaller than 1ha. As a result, the Council considers that if proposals were brought forward on such sites for only residential development many of the proposals would be consistent with existing planning policy and could not be refused. The adopted LDP is very supportive of delivering the housing land supply within the urban area on suitable sites as set out in Policy Hou1 and the provisions of Emp 9 must be seen in that context.

Therefore, under the existing adopted plan (CD039) there is only modest policy protection against change of use of the sites identified in the Plan to housing led mixed use. The Council's view is that the approach set out in the Plan is to recognise this existing trend of sites in employment use being redeveloped for housing use and seek to influence it more directly by formally allocating such sites for mixed use housing led development in the development plan. This approach allows the Council to more directly influence the mix of uses, the distribution of the uses within sites, for example by preparing development briefs, and to give the development planning system a more active role in the redevelopment of brownfield sites across the city. It will also provide the Council an opportunity to retain more business uses as part of their redevelopment than the existing policy position would allow, including sites of less than 1ha, in the context of 20 minute neighbourhoods. This will also promote the replacement of outdated business premises which otherwise may not be provided for or invested in.

In summary, the Council is seeking to influence existing trends for more positive outcomes of better retention of employment space and mix of uses rather than create a new radical trend.

The Council does not agree that Edinburgh will be left unbalanced in terms of its employment base, as much of the existing business land will be retained and protected under the Plan Policy Econ 4. In addition, the Plan has identified additional land (40.3ha) at Newbridge Industrial Estate in the form of an extension to the West. There is also 12ha of land still available within the existing Newbridge Industrial Estate that could accommodate relocating businesses. In addition, existing Business and Industrial land identified at, Brunstane (8.6ha) and Seafield, Site EW1d (26 ha), is available and could potentially accommodate some relocated businesses. This gives a total of approximately 87ha of land for potential industrial relocation.

**No modification proposed.**

BDW Trading (0350), Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495)

Only 16% of the sites identified within the Plan for mixed use development are in use as Industrial Estates/workshops as demonstrated in the Appendix to Issue 3 (CD144). The Plan continues to protect 483ha of land for Business, Industrial and Storage use and is promoting identified brownfield or formerly allocated sites for mixed use development not just residential development. As a result, the Council does not consider the strategy is in conflict with Aim 10 of the plan.

The Plan does not have a strategy of reallocating active business/industrial sites and allocated employment land to housing uses. This part of the strategy of the plan is to promote the redevelopment of existing brownfield sites, of which only a proportion are in industrial/workshop use, for mixed use housing led development. The Council's response to compulsory purchase is set out in its responses to matters related to the Economic Strategy below.

The Council does not consider the strategy radical. As set out in the Council's response to 0350 above, the Council's view is that the approach set out in the Plan is to recognise the existing trend whereby speculative proposals are brought forward by the market for the redevelopment of brownfield sites, such as those in employment use, within the urban area and to seek to influence it more directly by formally allocating such sites for mixed use housing led development in the development plan. Such an approach will enable the Council to retain more businesses uses where sites are being redeveloped than the existing policy approach as set out in the adopted plan (CD039).

The Council considers the strategy and aims of the Plan are clearly articulated and do not mislead stakeholders. Aim 2 makes it clear that development is being directed towards maximising the use of brownfield land and Aim 10 makes it clear that the strategy is seeking to deliver housing led mixed use development. It is important to recognise that the strategy is seeking to deliver a broad range of objectives including the need for future growth to be sustainable and net zero and the aims reflect and reinforce this. In contrast a strategy based on an alternative approach, as advocated in some responses, which included a less determined effort to deliver development on brownfield sites and a significant amount of greenfield development would risk a more significant loss of brownfield employment sites whilst having other environmental impacts such as the loss of

prime agricultural land and the risk of longer distance commuting, which would have to be subject to meaningful consideration and the Council considers could be contrary to the wider objectives of the plan. The strategy of the plan is seeking to avoid these alternative impacts.

The Council considers the representations misinterpret the development strategy of the Plan which seeks to maximise the use of brownfield sites for residential led mixed-use development, many of which could be granted consent for specifically residential development under the existing development plan policy. The Council also considers the representations also overstate the significance of the impact on existing businesses. It is important to recognise, as identified in the Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) by Ryden that the Council commissioned, that the redevelopment of older industrial buildings is not a new trend. The city has seen a significant amount of former industrial land redeveloped for other purposes as industry has evolved, changed or relocated. The report recognises that demand is strong for modern specification floorspace and smaller units, which fits with the Council's approach of promoting mixed use developments. It also provides justification for the Council to more directly intervene in the existing trend by altering the development plan strategy from the existing policy stance.

The plan is seeking to deliver mixed use housing led development on all allocations. However, the Council acknowledges that there may be some businesses that have to relocate, particularly class 5 developments which are not appropriate in a residential environment and the Council has identified additional land (40.3ha) at Newbridge Industrial Estate in the form of an extension to the West. There is also 12ha of land still available within the existing Newbridge Industrial Estate that could accommodate relocating businesses. There is also existing Business and Industrial land identified at, Brunstane (8.6ha) and Seafeld, Site EW1d (26 ha), that could potentially accommodate some relocated businesses. This gives a total of approximately 87ha of land for potential industrial relocation. In contrast the total size of the existing 15 industrial/workshop sites identified for development in the Plan is just 22.4ha. As a result, the Council considers that the development plan does have a mitigation strategy for the impacts on businesses that are unable to be retained within redeveloped sites.

The Council commissioned Ryden to prepare the Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) to update the 2018 Commercial Needs Study: Industrial Property Market report (CD035) and to consider the impacts of Option 1 of Choices for City Plan 2030. Option 1 was to deliver all development within the urban area. The Council considers the findings of the report helpful for its purpose of understanding the overall implications of the Plan development strategy in terms of its impact on employment land or land in employment use. The Council's view is that the approach and policies set out in the Plan seek to minimise the loss of employment uses and is expected to have positive benefits overall compared to the existing policy position set out in the adopted LDP (CD039). The impacts of the specific developments on land in employment use will also be considered at the time of proposals coming forward. For example, many businesses may be capable of being rehoused in smaller but more efficient units better suited to modern business needs. The Ryden (CD036) report points out on page 3 that "demand is strong for modern space, smaller units". In addition, some of the businesses may have already chosen to relocate and/or existing units may be vacant, for example site H59 was allocated on the basis that the occupier had chosen to relocate. As a result, the Council does not agree with objectors that further detailed analysis of the impacts should

be undertaken. In addition, the Council does not agree that it is possible to conclude at this time with certainty there is going to be significant impacts of the development strategy on employment land. **No modification proposed.**

#### Seedco (0198)

As stated above in its responses to 0350 the Council considers the displacement of businesses is not as significant or extensive as alleged in the representations. In addition, it considers the impacts of the strategy on existing businesses, particularly industrial uses, will be addressed sufficiently by mitigation measures set in the plan. The Council does not agree the strategy will leave Edinburgh the most unbalanced major city nor that it is contrary to the SDP strategy for the reasons set out in its response to 0350 above. **No modification proposed.**

#### Hallam Land Management (0615)

The Council considers it is making provision for the employment and economic needs of a growing population by promoting the development of mixed use housing led developments, thereby helping to renew dated employment real estate. It is also promoting significant development to the west of Edinburgh for mixed use development in the form of a city district, which meets sustainability and net-zero objectives. The Council considers the impacts on business are overstated and that the alternative proposals in some responses for greenfield sites around the city are a less sustainable option than the proposed strategy. **No modification proposed.**

#### Stirling Developments Limited (0303), Dandara East Scotland (0757)

The Council has addressed points relating to displacement of businesses in its responses to 0350 above. Matters relating to the delivery of housing are addressed under Issue 20 Assessment of Housing Land Supply.

The Council does not consider there is a contradiction in the Plan with regard to Econ 1. The Council considers the strategy of the plan is clear and is based on a mixed use development approach, to meet a wide set of aims and objectives, focusing on the delivery of brownfield sites. The Council acknowledges the economic value of house building and has identified a range of brownfield and greenfield sites in the Plan to deliver future housing development.

The Council is required to place the Proposed Plan on deposit for a statutory period to allow interested parties, including individuals, landowners and businesses to submit representations. In addition, in accordance with statutory requirements the Council has notified the occupiers and neighbours of properties directly to bring to their attention to the fact that their sites or adjacent sites have been allocated for mixed use housing led development. In response, a small number of representations (5) have been submitted to the Council from businesses occupiers on industrial estates in response to these notifications, which object to their site's allocation. Furthermore, there has been no objection from industrial estate owners and some support. Therefore, the Council considers it has met its statutory requirements.

The Council considers the impact of the development strategy on businesses, directing development to brownfield sites, is not as significant or extensive as alleged in the

representations and has set out its position in detail in its responses to 0350 above. As a result, the Council does not consider there is a cumulative impact in the context of Econ 2, which requires commercial development proposals over a certain size to include housing development. **No modification proposed.**

Steve Looms (0767)

The Council has addressed points relating to delivery of new homes etc in its response under Issue 20 Assessment of Housing Land Supply.

As stated above in its responses to 0350 the Council considers the displacement of businesses is not as significant or extensive as alleged in the representations. The overall traffic impacts of the strategy have been assessed by a Transport Appraisal that the Council has commissioned (CD014). The Council considers pursuing a predominantly brownfield redevelopment strategy, as set out in para 2.112 of the Plan, is likely to have fewer overall traffic impacts than a greenfield led housing development strategy because it will bring forward sites with much better accessibility to sustainable transport modes, helping to reduce car trip kilometres and increasing mode share. As a result, the Council does not consider the overall car travel impacts of redeveloping existing business or industry sites to be significant.

The Council considers the land identified for relocating businesses is sufficient as referred to in its response to 0350 above and does not consider that further greenfield land will be required to accommodate relocating businesses. The redevelopment of brownfield industrial sites is an existing trend as demonstrated in the findings of the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) where existing brownfield sites including site in employment uses are coming forward for redevelopment, particularly residential development.

Not all sites in employment use are the same, particularly with regard to their location, particular existing uses, values, and projected future income. Many of the sites allocated for redeveloped are occupied by real estate which is reaching the end of its working life and approaching obsolescence. Legislation such as section 63 of the Climate Change (Scotland) Act 2009 (CD143) (will limit the ability of landlords to lease out non-domestic properties with poor energy efficiency. The value of older real estate and the income it produces will therefore inevitably fall as it becomes obsolete and owners will be faced with the choice of investing in the real estate to refurbish/replace the buildings or selling the site for redevelopment. Market forces will mean that sites in locations less suited to modern employment uses are more likely to be redeveloped for alternative uses than those in strategic locations where employment uses can achieve high returns. It is for this reason that there has been long term trend for the redevelopment of certain sites in employment use to alternative uses. Residential land values have historically been higher, particularly compared to dated industrial stock, and as a result the Council does not consider the fact that sites have been in active employment use will intrinsically hinder the delivery of the strategy. In addition, it is important to recognise that the mixed-use strategy is seeking to provide new business units as part of the redevelopment proposals. As a result, the Council does not consider this likely to impede the implementation of the Plan Strategy.

The Council considers a range of sites have been identified in the Plan some of which have already been subject to planning applications. In particular, a large area of existing



(legacy) greenfield land in West Edinburgh has been re-envisaged for a high density mixed use urban extension in contrast to the range of smaller brownfield development opportunities identified throughout the city. In addition, it should be recognised that there are a number of much larger urban brownfield sites identified within the plan e.g. H55 Seafield. As a result, the Council considers that is fully compliant with SPP. In addition, the approach is also consistent with the emerging draft NPF4 as it seeks to ensure that new allocations are consistent with the principles of 20 minute neighbourhoods and an infrastructure first approach.

The Council considers the plan must be read as whole. Policy Re 4 applies to proposals for change of use of existing shop units, and would not be relevant to allocated sites being proposed for redevelopment. Furthermore, the plan is proposing the redevelopment of sites for mixed use development which would provide the opportunity to provide new retail units if required as part of the development.

The Council has prepared an Environmental Report (CD10) that carries out a strategic environmental assessment of the plan and its strategy. The Council has not received any significant criticism of the assessment approach adopted or the findings of the report by the consultation authorities (Nature Scot, Historic Environment Scotland, and Scottish Environment Protection Agency).

The Council considers the redevelopment of the identified brownfield sites for mixed use development will help to maintain the mixed-use nature of the city compared to the existing policy position set out in the adopted LDP (CD039). Matters related to displaced businesses are addressed in its response to 0350 above. The Council does not consider the strategy will have a significant impact on the City's employment base and considers its strategy is justified on many grounds for the reasons set out 0350 above.

The Council took into account the range of findings of the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) as one source of information in preparing the Plan. It must be recognised that the plan has many aims and objectives; for example delivering sustainable development and net zero. The redevelopment of existing brownfield sites, a proportion of which are in industrial use, dated and no longer fit for modern business needs, is not a new trend. The Council is seeking to directly influence this trend as set above in its response to 0350. The Council has identified sites for industrial uses that may have to relocate within the Plan and therefore considers it has helped to mitigate the risk of businesses relocating outside the Edinburgh area.

The Council does not consider it a necessary requirement for a site to be promoted by a landowner before it is identified as a suitable redevelopment opportunity in a Local Development Plan.

For the reasons stated above in its response to 0350 the Council considers the findings of the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report sufficient for its purpose of informing its understanding the overall implications of the Plan development strategy in terms of its impact on employment land. **No modification proposed.**

Barratt David Wilson Homes (0677), Dandara East Scotland (0757)

The Council has addressed points related to the displacement of businesses, relocation of businesses travel impacts, and land/residential value issues in response to 0350 and 0767 above.

The Council has addressed points related to retail policy Re 4 in its response to 0767 above.

The Council took into account the range of findings of the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) as one source of information in preparing the Plan. It must be recognised that the plan has many aims and objectives; for example delivering sustainable development and net zero. The redevelopment of existing brownfield sites, a proportion of which are in industrial use, dated and no longer fit for modern business needs, is not a new trend. The Council is seeking to directly influence this trend as set above in its response to 0350. The Council has identified sites for industrial uses that may have to relocate within the Plan and therefore considers it has helped to mitigate the risk of businesses relocating outside the Edinburgh area.

**No modification proposed.**

CALA Management Ltd (0465)

The Council has addressed points related to loss of land in employment use and suggested conflicts with Strategic Development Plan Policy 2, Supply and Location of Employment Land in its response to 0350 above. **No modification proposed.**

Scottish Property Federation (0144)

The Council has addressed points relating to the relocation of businesses in its response to 0350 above. The Council considers there is sufficient land identified to meet future employment needs over and above the needs of relocated businesses. Information on vacant land is set out in the Council's response to 0350 above. The Council does not consider the delivery of the strategy will be impeded by the compulsory purchase process which it considers is unlikely to be required. The Council addresses the issue of compulsory purchase in further detail in its response to (0677) below. **No modification proposed.**

Framework (Edinburgh) Limited (0743)

The majority of the existing businesses within the Stewartfield Industrial Estate (site H48) would be compatible with residential development in the context of a mixed use development. They include businesses such as gyms, bike repair, joinery, bakery, picture framers etc. As stated in the Council's response 0350 above the sites identified in the Plan are being promoted for mixed use housing led development. The estate is owned by J Smart and Co (page 39, Edinburgh Commercial Needs Study: Mixed Use Delivery report) who are active developers in the area and support the allocation of the site. **No modification proposed.**

Hallam Land Management (0599)

The Council has addressed points relating to the impact and relocation of businesses in its response to 0350 above. The Council has approved the Proposed Plan and it forms its

settled view. The Council considers the representation period met the statutory requirements. **No modification proposed.**

Stewart Milnes Homes (0118)

The Council has addressed points relating to the impact and relocation of businesses in its response to 0350 above. The Council considers the plan continues to safeguard 483ha of land across Edinburgh for business and industrial purposes. The Council does not consider the plan will have a disproportionate impact on the most deprived communities in the city.

The Council does not consider the strategy is radical for the reasons set out in its response 0350 above. For the reasons stated in its response to 0350 above the Council considers the findings of the Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) sufficient for its purpose of understanding the overall implications of the Plan development strategy in terms of its impact on employment land. **No modification proposed.**

Wright PDL (0078)

The Council does not consider there are several contradictions in the Plan. The Council considers the strategy of the plan is clear and is based on a mixed use development approach, to meet a wide set of aims and objectives, focusing on the delivery of brownfield sites. Points raised with regard to impacts on businesses, potential car travel impacts and business relocation are addressed in the Council's responses to 0350 and 0767 above. Matters relating to housing affordability are addressed under Issue 20: Assessment of Housing Land Supply.

The Council has addressed points related to existing land values and residential values in its response to 0767 above and considers the housing led mixed use development strategy is deliverable.

The Council considers its strategy, as set out in Aim 2 of the Plan, to direct new development to and maximise the use of brownfield land through housing led mixed use development will assist businesses by delivering more modern real estate that's better suited to modern businesses needs that the existing development plan policy position.

The Council considers its strategy, as set out in Aim 2 of the Plan, to direct new development to and maximise the use of brownfield land through housing led mixed use development will not restrict available homes, but will deliver more sustainable development by providing housing within the urban environment closer to existing infrastructure, including public transport and services/facilities.

The Council has set out its position with regard to the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) in its response to 0350 above.

The Council has addressed points relating to the impact and relocation of businesses in its response to 0350 above. **No modification proposed.**

Homes for Scotland (0404)

The Council has identified land for any displaced businesses within Business and Industrial land which is covered by Policy Econ 4 Business and Industry Areas. As a result, Policy Econ 2 would not apply.

There are numerous brownfield sites across the city that have been developed in recent years for mixed use development and the Council considers that developers are more than capable of redeveloping brownfield sites for mixed use development. An example of a mixed use development can be found on Macdonald Road which involved a garage below a residential development and is set out in the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036). In addition, there are numerous examples of small businesses below new residential development on Salamander Place in Leith. The Council acknowledges that the redevelopment of brownfield sites for mixed use development can be more challenging than bringing forward mono use greenfield residential sites. However, the Council considers that in order to deliver a sustainable development strategy and meet the other various aims and objectives including net zero it is vital that a strategy of directing development to and maximising use of brownfield land rather than greenfield land is pursued.

The Council has addressed points with regard to displacement of businesses in its response to 0350 above.

The Council has addressed points related to existing land values and residential values in its response to 0767 above and considers the housing led mixed use development strategy is deliverable.

The Council has addressed points related to retail policy Re 4 in its response to 0767 above.

The Council took into account the range of findings of the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) as one source of information in preparing the Plan. It must be recognised that the plan has many aims and objectives; for example delivering sustainable development and net zero. The redevelopment of existing brownfield sites, a proportion of which are in industrial use, in accommodation that is dated and no longer fit for modern business needs, is not a new trend. The Council is seeking to directly influence this trend as set above in its response to 0350. The Council has identified sites for industrial uses that may have to relocate within the Plan and therefore considers it has helped to mitigate the risk of businesses relocating outside the Edinburgh area.

For the reasons stated above in its response to 0350 the Council considers the findings of the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report sufficient for its purpose of informing its understanding the overall implications of the Plan development strategy in terms of its impact on employment land. **No modification proposed.**

#### J. Smart & Co. (Contractors) PLC (0483)

The Plan has allocated additional land (40.3ha) in the form of an extension to Newbridge Industrial Estate. This land is in close proximity to the M8 and motorway network with good access to the central belt. There is also 144.5ha of existing vacant industrial land across Edinburgh as shown in Appendix to Issue 3 (CD144). In addition, the Plan continues to safeguard land (483ha) (CD144) for Business, Industry and Storage

purposes across Edinburgh under Policy Econ 4. As a result, the Council considers that allocating further land for industrial development is unnecessary. The proposed brownfield development sites identified within the Plan which currently have business uses on them are being promoted for mixed use housing led development and not just housing development which is a fundamental part of the strategy. For the reasons set out in its response to 0350 above the Council considers the Plan's strategy will allow Council to more directly influence the existing redevelopment trend by altering the development plan strategy from the existing policy stance, ultimately to the benefit of businesses by updating the real estate to more modern facilities. The Council does not consider it necessary for the strategy to identify more greenfield development as addressed in Issue 2 Spatial Strategy. **No modification proposed.**

West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352)

The Council has set out its position with regard to the relocation of businesses under its responses to 0350 above.

The Council has set out its position with regard to land values under its responses to 0767 above.

Cala Management (0316)

The Council has addressed points relating to displacement of businesses in its responses to 0350 above. The Council has set out its position with regard to the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) in its response to 0350 above. **No modification proposed.**

Edinburgh Chamber of Commerce (0379)

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations as set out in its response to 0350 in the Business Impacts section above. **No modification proposed.**

**Economy Strategy**

Steve Loomes (0767), Wright PDL (0078)

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations as set out in its response to 0350 in the Business Impacts section above. As a result, the Council considers the Plan's strategy is not contrary with Econ 1.

The Council is required to place the Proposed the Plan on deposit for a statutory period to allow interested parties, including individuals, landowners and businesses to submit representations. In addition, in accordance with statutory requirements the Council has notified the occupiers and neighbours of properties directly to bring to their attention to the fact that their sites or adjacent sites have been allocated for mixed use housing led development. In response, a small number of representations (5) have been submitted to the Council from businesses occupiers on industrial estates in response to these notifications, which object to their site's allocation. Furthermore, there has been no

objection from industrial estate owners and some support. Therefore, the Council considers it has met its statutory requirements.

The Council has not undertaken any cost analysis of compulsory land purchase at this stage as it considers this is unlikely to be required. The Council considers the redevelopment of existing employment brownfield sites is an existing and long established market trend, particularly where sites have out of date real estate, which it wishes to directly influence by formally allocating redevelopment sites to ensure mixed use development is delivered. Further details relating to the Council's position are set out in its response to 0767 under Business Impacts above with regard to land use values.

There are numerous brownfield sites across the city that have been developed in recent years for mixed use development and the Council considers that developers are more than capable of redeveloping brownfield sites for mixed use development. An example of a mixed use development can be found at Macdonald Road involving a garage and residential development is set out in the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036). In addition, there are numerous examples of small businesses below new residential development on Salamander Place in Leith. The Council acknowledges that the redevelopment of brownfield sites for mixed use development is more challenging than bringing forward mono use greenfield residential sites. However, the Council considers that in order to deliver a sustainable development strategy and meet the various other aims and objectives of the strategy including net zero it is vital that a brownfield led strategy is pursued.

The Council acknowledges that, should it be necessary, it may have to use its compulsory purchase powers and this is referred to in the plan. However, it is envisaged that these powers would only be utilised in special circumstances and as a last resort rather than on a widespread basis. The Council has not undertaken any cost analysis of compulsory land purchase at this stage as it considers this is unlikely to be required; any usage of compulsory purchase powers would be analysed on a case-by-case basis. The Council considers the redevelopment of brownfield sites in employment use is an existing market trend which it wishes to directly influence by formally allocating redevelopment sites to ensure more mixed-use development is delivered. **No modification proposed.**

Barratt David Wilson Homes (0677)

There are numerous brownfield sites across the city that have been developed in recent years for mixed use development and the Council considers that developers are more than capable of redeveloping brownfield sites for mixed use development. An example of a mixed use development can be found on Macdonald Road involving a garage and residential development is set out in the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036). The Council acknowledges that the redevelopment of brownfield sites for mixed use development is more challenging than bringing forward mono use greenfield residential sites. However, the Council considers that in order to deliver a sustainable development strategy and meet the other various aims and objectives including net zero it is vital that a brownfield led strategy is pursued.

The Council acknowledges that the process of compulsory purchase can in some circumstances be challenging, costly, and time consuming. However, as stated above in its response to 0767 above the Council considers that compulsory purchase is unlikely to be required as the redevelopment of existing employment brownfield sites is an existing

and long established market trend which it wishes to directly influence by formally allocating redevelopment sites to ensure more mixed-use development is delivered. The fall in the value of outdated industrial real estate, as set out in the Council's response to 0767 under Business Impacts above, is a key market factor in perpetuating this trend and is a reason why the Council thinks compulsory purchase is unlikely. The Council is only likely to instigate compulsory purchase powers with regard to specific identified sites where there is market failure and this failure has implications in terms of delivering the strategy and more specifically the housing land supply. The Council has used these powers sparingly in the past for example as part of the St James Quarter redevelopment. In the unlikely event that the Council has to instigate compulsory purchase procedures to deliver sites it has the necessary expertise in house to action this. The Strategy of the plan has policy in place (Policy Hou4 Housing Land Supply) to ensure that it continues to maintain a sufficient land supply, whatever circumstances arise, including the release of greenfield sites should policy requirements be met. As a result, the Council considers the strategy approach is deliverable.

The Council has addressed points relating to loss of employment land in its response to 0350 in the Business Impacts section above. The Council considers the plan is in accord with the Council's economic strategy to enable good growth. **No modification proposed.**

#### Scottish Property Federation (0144)

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations for the reasons set out in its response to 0350 in the Business Impacts section above. In addition, the Council considers the representations misinterpret the development strategy of the Plan which is to maximise the use of brownfield sites for residential led mixed-use development many of which could be granted consent for specifically residential development under the existing adopted development plan policy. The Council also considers the representations also overstate the significance of the impact on existing businesses. The Council's position with regard to the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) is set out in its response to BDW Trading (0350), 0197 Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495) under Business Impacts above. The Council considers Policy Econ 4 a key part of the strategy as it seeks to protect identified areas of Business and Industry from change of use which results in loss of floorspace. Finally, it is important to recognise that none of the sites that have been identified for mixed use housing led development have been allocated previously under the adopted LDP (CD039) as protected Business and Industry land.

The Council considers that compulsory purchase is unlikely to be required for the reasons set out in its response to 0677 above and as a result it is unlikely to have an impact on achieving affordable housing targets.

The Council considers the Plan does address the challenges for retail and leisure in the context of Covid 19 as referred to in paragraph 2.145 of the Plan. The retail policies in the Plan continue to support the retail role of the city centre whilst allowing other complimentary uses including leisure as set out in Policy Re9. The Council does not consider the requirements set out in the plan to provide social infrastructure and affordable housing will inhibit delivery of development and these issues are addressed in the

Council's responses in Issue 27: Infrastructure Delivery and Developer Contributions and Issue 23 Affordable Housing. **No modification proposed.**

The Royal London Mutual Insurance Society Ltd (0149)

The Council has set out its position with regard to compulsory purchase in its responses to 0767 and 0677 above.

The Council Commissioned Ryden to prepare an Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) to update the 2018 Commercial Needs Study: Industrial Property Market report (CD035) and to consider the impacts of Option 1 of Choices for City Plan 2030. Option 1 was to deliver all development within the urban area. The Council considers the findings of the report sufficient for its purpose of understanding the overall implications of the Plan development strategy in terms of its impact on employment land for the reasons set out in its response to BDW Trading (0350), Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495) under Business Impacts section above.

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations for the reasons set out in its response to 0350 in the Business Impacts section above. In addition, none of the sites identified have previously been protected in the adopted LDP (CD039) for business and industrial purposes. The Plan continues to identify and protect a significant amount of land for business and industrial purposes as set out in its response to 0350 in the Business Impacts section above. **No modification proposed.**

The Council's responses to individual sites are dealt with under Issues 4-8 Proposed Sites.

Tarmac (0244)

The Council considers the strategy and aims of the plan are clearly articulated. Aim 2 makes it clear that development is being directed towards maximising the use of brownfield land and Aim 10 makes it clear that the strategy is seeking to deliver housing led mixed use development. It is important to recognise that the strategy is seeking to deliver a broad range of objectives including the need for future growth to be sustainable and net zero and the aims reflect and reinforce this. In contrast a strategy based on an alternative approach which included a less determined effort to deliver development on brownfield sites and a significant amount of greenfield development would have other environmental impacts such as the loss of prime farm land and the risk of longer distance commuting, which would have to be subject to meaningful consideration and could be contrary to the wider objectives of the plan. The strategy of the plan is seeking to avoid these alternative impacts.

With regard to the Choices report and the IBG, matters relating to individual sites are dealt with in the Council's responses in Issues 4-8 Proposed Sites.

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations for the reasons set out in its response to 0350 in the Business Impacts section above. The Council Commissioned Ryden to prepare a Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) to update the



2018 Commercial Needs Study: Industrial Property Market report (CD035) and to consider the impacts of Option 1 of Choices for City Plan 2030. Option 1 was to deliver all development within the urban area. The Council considers the findings of the report sufficient for its purpose of understanding the overall implications of the Plan development strategy in terms of its impact on employment land for the reasons set out in its response to BDW Trading (0350), 0197 Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495) under Business Impacts section above. **No modification proposed.**

#### Hallam Land Management (0615)

The Plan continues to identify 1802ha of land for employment purposes as shown in the Appendix to Issue 3 (CD144). This land is spread right across the city. Although 46 ha of land has been taken up since the SDP was approved there is still 144.5ha of vacant employment land available for this type of development. Land for approximately 483ha is also identified on the Plan Proposals map as 'Business and Industry Area', (CD144). These areas are covered by the Plan Policy Econ 4 Business and Industry Areas, which supports their use for business, industrial or storage uses. The policy has a presumption against changes of use on these sites which results in loss of these uses. Also 40.3ha of additional land has been identified as an extension to Newbridge Industrial Estate to accommodate businesses that have to relocate. The Council acknowledges the economic value of house building and has identified a range of brownfield and greenfield sites in the Plan to deliver future housing development.

The Council does not consider the assumptions made in relation to commercial needs are too broad brush or unrelated to any assessment of local needs and demands. The Council employed consultants to look at the potential impacts of the redevelopment of specific industrial sites right across Edinburgh. The Council considers the study gives a helpful strategic overview of this and is sufficient for its purposes in preparing the Plan. The Council considers its strategy aim of directing new development to and maximising the use of brownfield land rather than greenfield is much more conducive to delivering a network of 20 minute walkable neighbourhoods. Where the Council is supporting large scale development this is in the context of a highly accessible urban extension to the west of the city with good connections to existing infrastructure, which will also help to deliver 20 minute walkable neighbourhoods, unlike remote standalone developments.

The Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) updates the 2018 Commercial Needs Study: Industrial Property Market report (CD035) and includes analysis that takes account of the impacts of Covid at the time of publishing. As the situation is dynamic and subject to unpredictable events, for example the current cost of living crisis, the Council considers the report's contents and findings are sufficient for the purposes of understanding the industrial property market, the existing trends, possible impacts and preparing the Plan strategy. It is not feasible for the Council to regularly commission consultants to update reports throughout the lengthy LDP preparation process. The Council does not consider it necessary for the Plan to include strategic or regional economic related targets.

Representations have been received supporting in principle the Plan strategy to deliver housing development in West Edinburgh on part of the IBG and on the Edinburgh Bioquarter as part of mixed use development. These changes reflect broader market

changes pre and post Covid and are considered an important response to deliver the broad range of aims of the Plan's strategy.

The Council does not consider its strategy is contrary to the Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report. The Council considers it has taken cognisance of the findings of the study in preparing the Plan to ensure its strategy is robust and includes appropriate mitigation. **No modification proposed.**

Hallam Land Management (0599), Miller Homes Limited (0649)

The Council has addressed points with regard to compulsory purchase under its responses to 0767 and 0677 above.

The Council considers the findings of the Ryden Mix Use Delivery report (CD036) sufficient for its purpose of understanding the overall implications of the Plan's development strategy as set out in detail in its response to 0149 above. **No modification Proposed.**

Homes for Scotland (0404)

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations as set out in its response to 0350 in the Business Impacts section above. As a result, the Council considers the Plan's strategy is not contrary with Econ 1.

The Council has addressed the point with regard to the contribution house building makes to the economy in its response to 0615 above.

The Council has addressed the point with regard to contacting existing businesses in its response to 0767 above. The Council has addressed the point with regard to compulsory purchase in its responses to 0767 above. **No modification proposed.**

West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352)

The Council considers the displacement of businesses is not as significant or extensive as alleged in the representations as it sets out in its response to 0350 in the Business Impacts section above. The Council took into account the findings of the 'Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market' (CD035) when preparing the Plan. The Plan continues to identify and safeguard a significant amount of land for industrial and businesses purposes. There is a significant amount of vacant land available for business and the Plan also identifies an extension to Newbridge Industrial Estate. In addition, as stated in the Ryden Mixed Use Delivery study (CD036), only a third of the brownfield sites considered in preparing the plan are in active industrial use. As a result, the Council considers it has taken into account the findings of the study and has specifically allocated business and industrial land to address any business relocation.

The Council has addressed points with regard to compulsory purchase and delivery of the strategy in its responses to 0767 and 0677 above. **No modification proposed.**

CALA Management Ltd (0465)

The Council has addressed points with regard to compulsory purchase and delivery of the strategy in its responses to 0767 and 0677 above. **No modification proposed.**

Lord Dalmeny (0475)

The Council has provided information with regard to whether or not sites are in operational business use in its response to 0350 in the Business Impacts section above. The Council stresses that none of the brownfield sites allocated for redevelopment are safeguarded under the Plan's policy for business or industrial purposes. As a result, the Council does not consider it necessary for the Plan strategy to set out this additional information with the plan.

The Council does not consider it feasible to identify the amount of current operational employment that will be displaced. As the Council is pursuing a mixed-use housing land delivery strategy it is intending to retain as many businesses as feasible within the redeveloped sites. The Council's view is that the approach and policies set out in the Plan seek to minimise the loss of employment uses and is expected to have overall positive benefits compared to the existing policy position set out in the adopted LDP (CD039). The impacts of the specific developments on employment uses will be considered at the time of proposals coming forward, for example, many businesses may be capable of being rehoused in smaller but more efficient units better suited to modern business needs. The Ryden Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) points out on page 3 that "demand is strong for modern space, smaller units". In addition, some of the businesses may have already chosen to relocate and or existing units may be vacant, for example site H59 was allocated on the basis that the occupier had chosen to relocate. As a result, the Council does not agree with objectors that further detailed analysis of the impacts should be undertaken. In addition, the Council does not agree that it is possible to conclude at this time with certainty there is going to be significant impacts of the development strategy on employment land. The plan has allocated additional land at Newbridge for relocated businesses. The Council considers this and existing business and industrial land identified in the Plan exceeds the amount of industrial land identified for redevelopment.

The Council considers the impact of the development strategy on businesses, directing development to brownfield sites, is not as significant or extensive as alleged in the representations and has set out its position in detail in its responses to 0350 above. As a result, the Council does not consider there is a cumulative impact in the context of Econ 2, which requires commercial development proposals over a certain size to include housing development.

The Council considers the need for the compulsory purchase of land is unlikely for the reasons set out in its responses to Steve Loomes (0767), Wright PDL (0078) above.

The Council considers it has provided sufficient land to accommodate the needs of any businesses having to relocate for the reasons set out in its response to 0483 above. In addition, the extension of Newbridge Industrial Estate was identified under Choice 16 in Choices for City Plan 2030 on page 59.

The Council considers that the plan provides a generous supply of land for business and industry purposes as set out in its responses to 0350 and BDW Trading (0350), 0197

Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495) above. **No modification proposed.**

#### Taylor Wimpey East Scotland (0770)

The Council considers the displacement of businesses is not as significant or extensive as alleged in the representations and sets out its position in its response to 0350 in the Business Impacts section above.

Matters relating to industrial use value have been addressed in the Council's response to 0767 in the Business Impacts section above.

The Council considers it has taken into account the findings of the 'Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market' (CD035) when preparing the Plan as set out in its response to 0352.

The Council has set out its position with regard to the findings of the Commercial Needs Study in its response to 0352.

The Council has set out its position with regard to compulsory purchase and delivery of the strategy in its responses to 0767 and 0677. **No modification proposed.**

#### Rosebery Estate (0618)

The Council considers it has taken into account the findings of the 'Edinburgh City Plan 2030 Commercial Needs Study: Mixed Use Delivery' (CD036) when preparing the Plan as set out in its response to 0149 above and it considers the findings of the report helpful for its purpose of understanding the overall implications of the Plan's development strategy in terms of its impact on employment land. Traffic impacts of the strategy have been assessed by a Transport Appraisal (CD14) that the Council has commissioned and the impacts are considered less than a greenfield housing development strategy as set out in the Council's response to 0767 in the Business Impacts section above.

Only 16% of the sites identified within the Plan for mixed use development are industrial estates/workshop units as demonstrated in the Appendix to Issue 3 (CD144) i.e. uses that may be incompatible with residential uses. The rest of the sites are either uses compatible with a residential environment or are open space/vacant/car parks. The Plan continues to protect 483ha of land for Business, Industrial and Storage use and is promoting identified brownfield sites for mixed use development not just residential development. Further details of the Council's position are set out in its response to BDW Trading (0350), 0197 Murray Estates (0197), SEEDco (0198) Taylor Wimpey (0200), Robertson Residential Group Limited (0490), Persimmon Homes (0495) in the Business Impacts section above. As a result, the Council does not consider the strategy is in conflict with Aim 10 of the plan.

The Council considers it has considered the impacts on businesses as set out in its responses to 0144 and 0767 above. **No modification proposed.**

#### Landowner of East Foxhall (0544)

The Council has set out its position with regard to compulsory purchase and delivery of the strategy in its response to 0767 and 0677. The Council considers a range of sites have been identified in the Plan some of which have already been subject to planning applications. In particular, a large area of existing greenfield land has been identified in West Edinburgh for a high density mixed use urban extension in contrast to the range of smaller brownfield development opportunities identified throughout the city. In addition, it should be recognised that there is a number of much larger urban brownfield sites identified within the plan e.g. H55 Seafield. As a result, the Council considers that is fully compliant with SPP.

The Council considers the redevelopment of brownfield industrial sites is an existing trend as demonstrated in the findings of the Ryden Mixed Use Delivery report (CD036), where existing brownfield sites including site sin employment use are coming forward for redevelopment particularly residential development on sites with aging real estate. There is already some support for allocation of sites from existing land owners and the Council considers it will be able to deliver a sufficient housing land supply. The Strategy of the plan has policy in place (Policy Hou4 Housing Land Supply) to ensure that it continues to maintain a sufficient land supply, whatever circumstances arise, including the release of greenfield sites should policy requirements be met. As a result, the Council considers the strategy approach is deliverable. **No modification proposed.**

#### Cala Management (0316)

The Council has set out its position with regard to compulsory purchase and delivery of the strategy in its responses to 0767 and 0677. **No modification proposed.**

#### Forth Ports (0496)

The Council has addressed points with regard to compulsory purchase and delivery of the strategy in its responses to 0767 and 0677 above. **No modification proposed.**

#### Leith Central Community Council (0614)

The definition of brownfield in the Plan is consistent with definition in SPP. **No modification proposed.**

#### Stoddart Family (0749)

The Council considers the loss of employment land is not as significant or extensive as alleged in the representations as set out in its response to 0350 in the Business Impacts section above. The Council considers it has provided sufficient land to accommodate the needs of any businesses having to relocate for the reasons set out in its response to 0483 above. **No modification proposed.**

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

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## **Appendix to Issue 3**

**Table 1: Summary of employment land allocated in the Proposed Plan including employment land take-up since 2009**

	<b>Total area in Plan</b>	<b>Vacant / Available for</b>	<b>Takeup 2009 - 2022</b>	<b>Vacant + Takeup</b>
Business and Industry Land	483	59.5	25.3	84.8
Strategic business centre*	272	17.1	10	27.1
Area of Economic Importance**	920	67.9	10.7	78.6
<b>Total in plan allocated areas</b>	<b>1675</b>	<b>144.5</b>	<b>46</b>	<b>190.5</b>

\* Employment land at International Business Gateway estimated at 10ha.

\*\* IBG is an area of economic importance and a strategic business centre. Employment land at IBG has only been included under strategic business centre.



**Map of the Dublin Region**

**Legend**

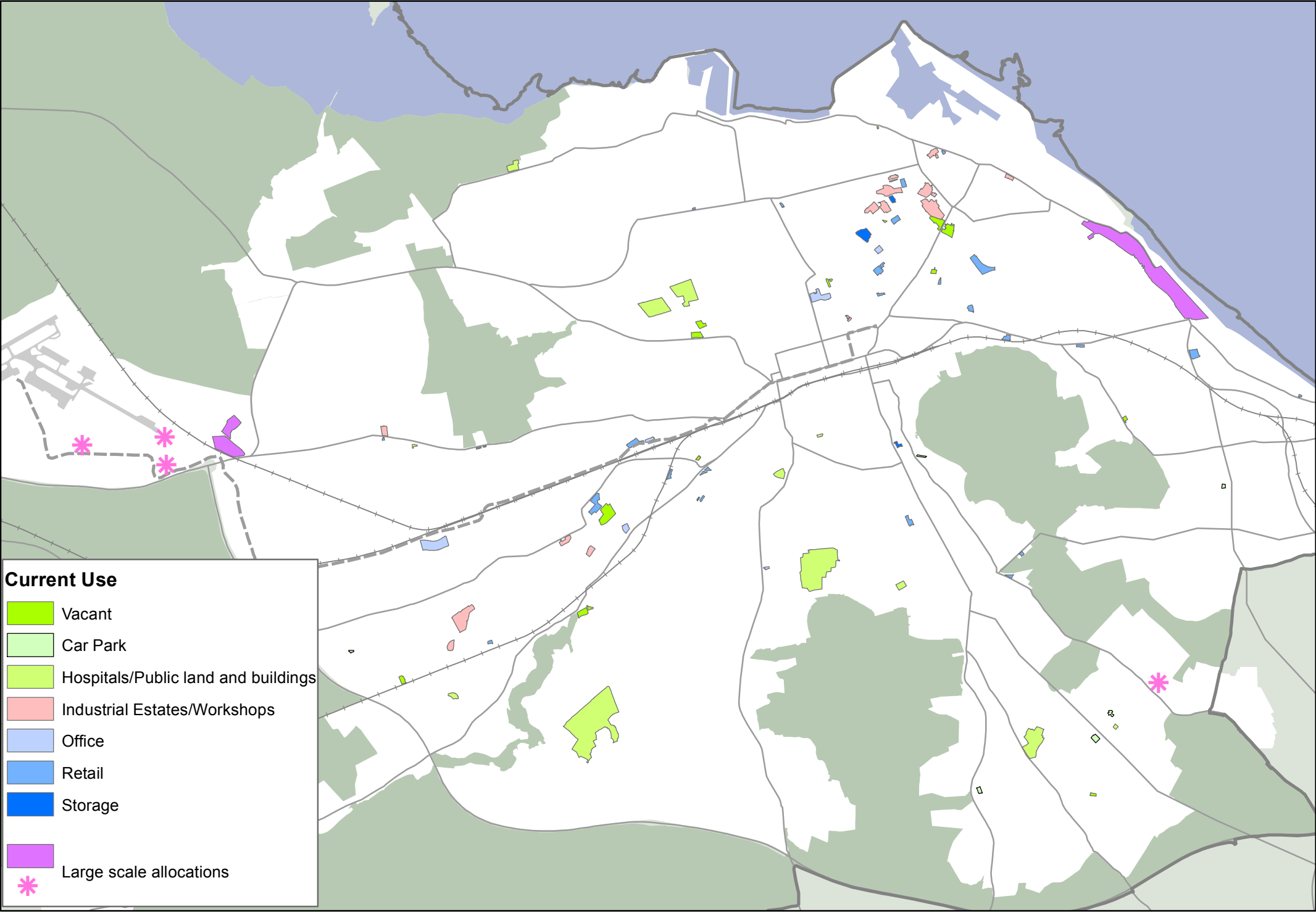
- Strategic Business Centre
- Areas of Economic Importance
- Business and Industry Area
- Available Land 2022
- Take up 2009 - 2022

**Table 2: Proposed housing sites by current use**

	Sites		Units		Area	
	No	% Total	No	% Total	Ha	% Total
Industrial Estates/Workshops	15	16%	2,758	11%	22.4	7%
Offices	7	7%	1,035	4%	9.5	3%
Retail	28	29%	2,027	8%	14.8	4%
Storage	4	4%	176	1%	2.9	1%
Car parks	6	6%	172	1%	1.9	1%
Hospitals/Public land and buildings	12	13%	2,663	11%	73.6	22%
Vacant	16	17%	1,871	7%	12.6	4%
Large scale allocations*	7	7%	14,250	57%	200.4	59%
	95		24,952		338.1	

\* Sites H55, H59, H60, H61, H62, H63, H86

Map 2: Housing Proposals by Current Use



<b>Issue 4</b>	<b>Proposed Sites Central Edinburgh</b>	
<b>Development plan reference:</b>	Part 3: Policies - pages 42-45 and Part 4 Table 2 pages 157-158	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <div> Alasdair Wilson and Gaelle Geveaux (0807)  Alexandra Stevenson (0304)  Alison Stoddart (0658)  Alix Speed (0043)  Amanda Michie (0217)  Amy Middlemass (0629)  Andrew and Alison Ferguson (0429)  Andrew Gray (0388)  Angela Ball (0277)  Anne Binckebanck (0372)  Annie Bell (0136)  Annie McIntyre (0802)  Archie Clark (0003)  Astley Ainslie Community Engagement Group (AACEG) (0275)  Astley Ainslie Community Trust (0318)  Aviva Life and Pensions UK Limited (0598)  Blandfield Residents Association (0426)  Brenda Rowan (0488)  Cameron Prentice (0076)  CASL Stanley Place Property Owner Limited (0737)  Charlie Clark (0790)  Chris Byrne (0297)  Cockburn Association (0777)  Colin Fraser (0106)  Corline Elisabeth Scholes (0713)  Cynthia Shuken (0632)  Dalry Local Residents (0267)  Daniel Gough (0421)  Dave Berry (0463)  Dr Jane Gear (0487)  Dr Y Wang (0522)  Edinburgh Chamber of Commerce (0379)  Edinburgh World Heritage (0339)  Elgin Haymarket Limited (0292)  E Ritchie and D Melrose (0430)  E Roberts (0471)  Ewan Gray (0103)  Felix Freund (0530)  Fiona Brownlee (0796) </div> <div> LaSalle Investment Management (0262)  Lee Davis (0117)  Living Streets Edinburgh Group (0486)  Liz Glass (0645)  Lorraine Smith (0462)  Louise Blanke (0675)  Luke Treadwell (0748)  Maciej Malaszuk (0179)  Maggie Carson (0105)  Margaret Newman (0697)  Mark Ockendon (0419)  Marton Feigl (0196)  Melford Developments Ltd (0308)  Melissa Sharkey (0684)  Michael Adrian Hall (0261)  Michal Rozynek (0626)  Mr Gareth J Roberts (0335)  Mr Roger Thomas (0345)  Murrayfield Community Council (0146)  NatureScot (0528)  Neil Ross (0610)  Network Rail (0071)  New Town and Broughton Community Council (0254)  NHS Lothian (0596)  Nick Johnstone (0368)  Nick Sherington (0500)  Nigel Sedgwick (0680)  Nuveen Real Estate (0564)  Olwyn Alexander (0351)  Patricia Willder (0205)  Peter Edwards (0601)  Prof D N Bateman (0004)  Richard Beauchamp (0604)  Ruth Beauchamp (0458)  Ruth Buchanan (0083)  Richard Doake (0436)  Robert Falcon (0640)  Royal Mail Group Limited (0501)  Sally Kerr (0435)  Sandy Ramsay (0026) </div> </div>		

<p>Frances Guy (0589)  Francesca Fiori (0390)  Gabriela Medero (0022)  George Goussetis (0269)  Grange/Prestonfield Community Council (0192)  Hannah and Chris Edwards (0696)  Hazledene House Limited (0695)  Helen Sugden (0797)  Hervé Saint-Amand (0276)  Iain Leslie (0586)  Ian Ross (0423)  Inverdunning (Hatton Mains) Ltd (0427)  Irene Kernan (0549)  Italian Consulate General for Scotland and Northern Ireland (0320)  Jan Hulme (0420)  Jane Dudman (0563)  Janet Woolley (0470)  Jennifer Hall (0534)  Jennifer Inglis (0437)  Jennifer Newton (0679)  Jennifer Roe (0407)  John Falconer (0401)  Jonty Bredin (0682)  Julia Caroline Higgitt (0067)  Julie McIlroy (0373)  Juniper Green &amp; Baberton Mains Community Council (0306)  Katharine Quinn (0015)  Kathryn Poolman (0574)</p>	<p>Sarah Roberts (0630)  Scottish Wildlife Trust Lothian group (0560)  SEPA (0012)  Sergey Gorobets, (0414)  Shelagh Sharp (0111)  Shona Simon (0242)  Simon Thomson (0248)  Simon Paget-Tomlinson (0375)  Southside Community Council (0781)  Stephanie Stevenson (0793)  Steve Garrett (0359)  Terry Levinthal (0313)  The Institute of Chartered Accountants of Scotland (0182)  Theo Scott (0014)  Thomas Unter (0204)  Tollcross Community Council (0332)  Teresa Fernandes (0194)  Tom Proudfoot (0740)  Vanessa Steven (0755)  Vincent Meiklejohn (0069)  Wendy Johnson (0002)  West End Community Council (0692)  William Brotherston (0754)  William Craigie (0186)  William Mason (0438)  William Moyes (0305)  Yinshuang Ding (0086)</p>
<p><b>Provision of the development plan to which the issue relates:</b></p>	<p>This section of the Plan sets out place policies and identifies housing proposals in Central Edinburgh.</p>
<p><b>Planning authority's summary of the representation(s):</b></p>	
<p><b>General</b></p> <p><u>New Town and Broughton Community Council (0254)</u></p> <p>Generally supportive of the principle of brownfield development rather than in the outer environs of Edinburgh, however have some concerns with the extent of development proposed. Note from a brief analysis of the North East locality proposals map that it allocates a number of sites totalling approximately 950 units. However note there are sites currently either in pre-consultation or with planning applications already submitted and that these, along with understatements that there are over 400 units on sites not included in the proposals map for the North East Locality. Concerns with a number of the brownfield sites which are currently occupied with commercial activities. Believe sites are beneficial to both the overall character of the area and provide employment opportunities or services to city centre residents. There is a danger in this approach – in that it may sterilise many</p>	

areas in the inner city and consider approach is it at odds with the broader '20 minute' neighbourhood approach.

## **Place 1 – Edinburgh City Centre Policy**

### Dave Berry (0463)-support

Agrees with reducing car use and making the city centre more friendly for pedestrians

### Katharine Quinn (0015) – support

Supports proposals for Central Edinburgh.

### Network Rail (0071) - support

Supports the recognition of the need for change, delivered through the emerging Waverley Station Masterplan in order to deliver increased rail passenger capacity at paragraph 3.10.

### Archie Clark (0003)

Considers that traffic free streets create problems for residents and result in loss of population. Considers that promoting 'last-mile delivery by cargo bikes and low or zero emissions vehicles impractical and better low-cost parking facilities are needed. Considers opening sentence of Place 1 to be lengthy and considers it suggests that a planning application has only to satisfy the stated criteria in order to be approved. Provide alternative wording and suggest that this change in emphasis should be applied to all Places Policies. Consider Place 1 paragraph 3.11 to be outdated and contrary to 20-minute neighbourhoods. Primary requirement should be housing. Office space may also be encouraged as needed for balance. Suggests that Waverley Station should be integrated with tram and bus networks and to enhance the retail experience in Princes Street there is a need for pedestrian crossings and suggests underground passages and adjustment of traffic light timings. Considers that George Street would benefit from an underground car park and temporary attractions in the centre of the street do not enhance its appearance.

### Aviva Life and Pensions UK Limited (0598)

Overall supportive of Place 1 and flexibility that it provides. Acknowledge that there are limited land resources available to support further significant investment and development, therefore submit, the Council should further support a higher density and taller scale of development at Haymarket. Encourage the Council to develop policy further, and suggest that reference could be made to the fact that development of a significantly higher density, and potentially taller height, should be designed for scarce, brownfield city centre development sites such as Rosebery House and those in the Haymarket area, to ensure that their potential is realised, subject to prospective applicants demonstrating that there would be no adverse impact on existing uses, the city skyline, key views and surrounding amenity, as required.

### Cynthia Shuken (0632)

Objects to major development in the city centre and consider this would ruin the unique character of the city and its neighbourhoods.

Cockburn Association (0777)

Broadly supportive of the City Centre Transformation project and its various proposals however have concerns with renewal of the Ross Bandstand and other facilities in West Princes Street, and do not support the radical redevelopment vision of the Ross Development Trust to create a 4-6,000 seat venue in the heart of West Princes Street Gardens. Consider a number of the plan's environmental policies are relevant and Place 1 should be amended to include reference to other policy objectives such as protecting the special characteristics and outstanding universal values.

Edinburgh Chamber of Commerce (0379)

Considers that the re-purposing and re-imagining of Princes Street particular will be critical to how the city centre is supported to cope with the changes in citizen behaviour which both changing retail habits and the long term impact of the pandemic will have.

Focus on mixed use spaces, and specific reference to the city's office space requirements are particularly welcomed, and note the Council's City Centre Transformation Plan's impact on this strategy, alongside City Plan 2030.

With regard to references to reduced parking and vehicle access, re-iterate the need for close engagement and consultation with affected businesses. More detail required as to how this will be done effectively, and happy to work with the Council to ensure affected businesses can engage appropriately.

Edinburgh World Heritage (0339)

Fully support the principle of the emerging Princes Street and Waverley Valley Strategy and Place Brief. Consider that a more varied mix of uses be explored and encouraged, to ensure that upper floors in particular remain in use, which may be in residential, cultural or other use. Suggests amendments to Place 1 to reflect the importance of area as a World Heritage Site and the need to protect and enhance this and advise reference to design, quality and source of materials, height, scale, massing, layout and local details. Suggest inclusion of reference at paragraph 3.3 to the importance and method of engaging the local community and wider stakeholders in the development of principles for development of their areas. Also suggests amendment to 3.6 to refer to co-supporting and competing priorities.

Elgin Haymarket Limited (0292)

Support the encouragement of a comprehensive approach to redevelopment and regeneration. Consider Haymarket District to be an evolving area of change, with many opportunities to be acknowledged and planned for comprehensively. Consider there is a mis-match between what city centre is and what it could be. Consider that Haymarket District is particularly important for the City Centre and consider it to be a sustainable location at a major public transport hub, proximity to local/long distance cycle routes and its role as a 'transition buffer zone' for Edinburgh's World Heritage Site. Consider there is an opportunity, through redevelopment, to positively address the image of Haymarket for

those travelling from the west and for site to become an important frontage/arrival place. Through emerging planning application have identified Development Principles and consider this approach mirrors the place-based policies in the Plan and should be formalised as Place 1b. Submit a supporting document which identifies the site. Should continue key principles of current LDP and intensify these in the context of City Plan 2030 place based approach.

Hazledene House Limited (0695)

Support development in the City Centre which promotes its role as the hub of the city region as well as the creation of 20-minute walkable neighbourhoods and embedding a 'place-based' approach. Fully support the preparation of the Princes Street and Waverley Valley Strategy. Strategy should seek to address: the future role of Princes Street and the level of vacancies at all floors; the shift of the focus of retail within Edinburgh away from Princes Street to the Eastern End of the City Centre and the new St James Centre; Rose Street and connecting streets given relationship to Princes Street and the opportunity to make better use of the lanes between them. Strategy should recognise that selective demolition to remove redundant buildings could assist in delivering a greater mix and density of uses and provide opportunities for new permeability and greater use of the lanes; and underutilised floorspace at upper floors on both Princes Street and its immediate, surrounding streets.

Juniper Green & Baberton Mains Community Council (0306)

Consider that Place 1 suggests that a planning application has only to satisfy the stated criteria in order to be approved and it would be better stated, "Planning permission will only be considered for development which lies within the area of the City Centre as defined on the Proposals Map and which at a minimum retains and enhances its character, attractiveness, vitality and accessibility and contributes to its role as a strategic business and regional shopping centre and Edinburgh's role as a capital city." Considers that this change in emphasis should be applied to all Places and policies that contain the same initial phrase. Place 1 paragraph 3.11 seems outdated and contrary to the 20-minute neighbourhood concept. Consider that while some further office space may be necessary, the primary requirement should be housing in order to retain a vibrant city centre that is lived-in rather than hollowed out in the evenings and weekends, while also reducing commuting. Office space may also be encouraged as needed for balance.

LaSalle Investment Management (0262)

Overall supportive of Place 1 and flexibility that it provides. Welcome retained reference from the current Local Development Plan Policy Del 2 City Centre that the Council will support "comprehensively designed proposals which maximise the potential of the site". Acknowledge that there are limited land resources available to support further significant investment and development, therefore submit that given the unique, brownfield opportunity that Haymarket presents, the Council should further support a higher density and taller scale of development in this location. Subject to prospective applicants demonstrating that there would be no adverse impact on existing uses, the city skyline, key views and surrounding amenity.

Living Streets Edinburgh Group (0486)



Support paragraph 3.7 and paragraph 3.8 but suggest paragraph 3.8 is reworded more positively to state "To achieve these outcomes, the allocation of street space will be rebalanced to reflect the transport hierarchy with walking prioritised...." Considers that Place 1 (d) as worded "where achievable" gives developers a way out. Considers developments have to provide traffic-free pedestrian routes. Where it is demonstrated that vehicle access is required and assessment shows that it is not possible to provide separate pedestrian routes development should not be permitted. Considers a less preferable alternative could be a shared route with clear pedestrian priority and traffic managed appropriately.

#### Melford Developments Ltd (0308)

Considers that central Edinburgh is a distinct and diverse locations and the policy response is uniform and formulaic. Some locations and buildings will not be able to accommodate a mix of uses. Consider that the policy, in combination with design and environmental policies, is potentially damaging redevelopment potential. Consider that the requirement for urban realm and civic space is unclear. The capacity for the city centre to accommodate office development in favour of other locations needs to be reviewed against public transport accessibility and capacity. Refers to Policy Econ 3 where there is a threshold of 2,500 sqm and does not consider this to be reasonable in a city centre location.

#### SEPA (0012)

Pleased to see proposals for the city centre come forward into the Plan however consider paragraph 3.12 (c) could be more explicit in mentioning green/blue infrastructure as part of train station upgrade, capturing water nearby e.g. Princes Street Gardens and council car park areas.

#### Nuveen Real Estate (0564)

Generally supports Policy Place 1 but requests that the supporting text at paragraph 3.11 explicitly acknowledge that activation of the city centre's publicly and privately owned external spaces represent an opportunity to provide a diversity of uses and activities, generate additional footfall for the city centre and as such maintain and enhance the vitality of the retail offer in the city centre.

#### Southside Community Council (0781)

Strongly supports the aims set out in paragraph 3.7 of prioritising walking, wheeling and cycling to create a largely traffic-free city centre by 2030 and Place 1 (d) "the creation of new civic spaces and traffic-free pedestrian routes where achievable", however consider that the addition of where achievable weakens the aspiration.

#### The Institute of Chartered Accountants of Scotland (0182)

Supportive of City Centre Policy and the flexibility. Welcome retention of LDP Policy Del 2 City Centre at Place 1 (a) that the Council will support "comprehensively designed proposals which maximise the potential of the site" and encourage the Council to develop policy requirement further, making reference to the fact that development of a significantly higher density, and potentially taller height, should be designed for scarce city centre

development sites, to ensure that their potential is truly realised.

Propose that reference could be made to Haymarket Yards in the context of the proposed policy as an area within the city centre where such density of development, and additional height, could be supported, subject to prospective applicants demonstrating that there would be no adverse impact on existing uses, the city skyline, key views and surrounding amenity, as required. Haymarket Yards as an area would benefit from increased support for development from the Council as a means of realising its potential and suggest that making reference to the area within the context of the proposed Place 1 should be considered.

#### West End Community Council (0692)

Considers that there has been inadequate consideration of the West End as a place and as a consequence issues have been created which will last for many generations and degrade rather than improve the locality. Considers that the lack of a distinct locality plan makes council officers decision-making on many matters difficult and inconsistent, affects investment decisions and therefore it suffers as a great place to live, work or play. Considers that the vitality of the West End is founded on diversity, not a monoculture commercial district nor a residential neighbourhood and the locality plan should address all the aspects that support this diversity in all its many dimensions.

#### **Place 2 – Fountainbridge**

##### Cockburn Association (0777)

Broadly supportive of Place 2 however recommend an additional statement supporting the vertical integration of uses in each development area. Large, mono-use blocks should be avoided.

##### Janet Woolley (0470)

Concerned new development will reduce the availability of community space. Would like to see a permanent site allocated to community garden. Supportive of active travel plans.

##### Living Streets Edinburgh Group (0486)

Express qualified support. Considers policy needs to be stronger and include separate not shared pedestrian and cycle links, and statement that with any other required works they remove not reduce the barrier effect to accord with the transport hierarchy.

##### Mark Ockendon (0419)

Place 2 (g) "protect and enhance key townscape views" - add "including clear views of the existing skyline by restricting the height of new developments"

##### SEPA (0012)

Consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Review of the

surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

### **Place 3 and H8 Astley Ainslie**

#### SEPA (0012)

Support the daylighting of the Jordan Burn and the identification of the need for buffer zones and the reference made to blue corridors to reduce impacts on Jordan Burn. Stress that any daylighting at this site should be informed by a flood risk assessment and the 5' new' watercourse may have to be included in future FRA to inform new development but consider there are good opportunities to improve the water environment.

#### Alison Stoddart (0658)

Considers the proposal will completely change the site and deny community access to green space. Priorities should be green space, community infrastructure and then housing. Plans do not consider impact on the biodiversity. The proposed building is excessive, and buildings should at the very least be carbon neutral. Ideally any new development should only be permitted on the existing footprint of current or recently demolished buildings and take account of the existing trees.

Considers that a full archaeological survey should be undertaken. Existing rights of way across the whole site must be preserved. Provision of education, healthcare infrastructure and community facilities should be on-site.

#### Andrew Gray (0388)

Should not be made into a high-density village. Woodland should be encouraged and the grounds should become a park with the older houses made into private properties. The modern hospital buildings should be demolished and then built in traditional style for, perhaps, an artists' community, or a similar grouping with an interest in ecology/the arts/urban farming etc. This would both protect the area, connect it with the Hermitage/Midmar Paddock and enhance the quality of life in the area, as well as providing accommodation for perhaps four or five hundred people whilst meeting exacting environmental standards.

#### Annie Bell (0136)

Priority for site should be greenspace, community infrastructure and then housing. Considers that development should only take place on the footprint of existing, non-listed buildings. All buildings should be carbon neutral. In particular the area/site of Woodburn House is not conducive to development due to flooding. Views from Blackford Hill of the site and its existing tree canopy and public access should be maintained. Trees should be protected. A protected species assessment should be undertaken and other flora and fauna should also be protected. Consider 500 units to be excessive in Conservation Area. Supportive of daylighting the Jordan Burn though the suggested separation of 15m from any new development is insufficient.

#### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Noticeable that hospitals are not included in the 20-minute neighbourhoods and questions if hospital provision should be retained. Would be undesirable to remove hospitals to difficult-to-access areas and there is no policy to cover this.

Principles refer to density requirements in Table 2 but none are set out. 500 units is contrary to statement that "Proposals for any part of this site in advance of an approved Place Brief will be considered as premature".

Considers there to be typos and that bullets should be replaced by numbers and the full plan should be grammatically correct and easy to read.

Considers the description of mobility hubs in the Glossary to be limited and would be helpful to show an example.

#### Astley Ainslie Community Engagement Group (AACEG) (0275)

Explains that the Astley Ainslie Community Engagement Group was set up by NHS Lothian in 2016 to represent the local community councils and to advise on consultation with the community. Submits views from 191 completed which suggested keeping the open green spaces and parkland feel, voiding high-rise flats, keeping as many of the trees as possible, mixed residential including affordable housing, facilities for the community, protection of rights of way, protecting existing buildings (especially listed), inclusion of medical facilities, educational facilities, small commercial units, avoiding luxury accommodation, no through roads and improved public transport.

Site is valuable resource as little other open space for recreation within a short walking distance. Consider a non-statutory brief inadequate and should be policy. Trees, formal rights of way and public access to the site as a whole should be preserved. Suggest the addition of development principles to require that affordable/social rent housing should be on site and integrated in the development, new or refurbished housing offers the opportunity for modern eco-friendly development and views from Blackford Hill are especially important for the city.

Consider that additional primary and secondary places will be required and some of this must be in the new primary school under construction in Canaan Lane and in Gillespie's secondary school. Considers that primary care facilities will be required. Consider that public transport will be essential and there are no details of this.

#### Astley Ainslie Community Trust (0318)

Generally supportive but note that a lot will depend on place brief. Consider proposed density is incompatible with retaining the greenspace and note that the site provides accessible greenspace at present which needs to be retained and enhanced (paragraph 2.28), meet the Councils Open Space Strategy (paragraph 2.32) and goal of 1 million trees (paragraph 2.70). Proposed 500 units could be considered excessive in a conservation area. All buildings should be carbon neutral.

Considers that a full archaeological survey should be undertaken before any development is authorised. Supportive of Place 3 (e). Supportive of daylighting the Jordan Burn but consider a 50 m set back should be required. Existing rights of way across the whole site

must be preserved. Provision of education, healthcare infrastructure and community facilities should be on-site.

Cockburn Association (0777)

Generally supportive however request that the first bullet point should be amended to preserve the mature landscape setting of the site to ensure that any development starts from the objective of conserving the character of the site.

Colin Fraser (0106)

Site should not default into the housing-led development category and Council should consider the opportunity to protect the area for future generations using a community-based policy that focuses on facilities that can embrace and enhance this location and maintain its healing ethos.

Dave Berry (0463)

Considers existing play provision is inadequate and does not meet the requirements of the Council's Open Space Strategy therefore it is incumbent on the development of the Astley Ainslie site to provide facilities for houses beyond the site.

Fiona Brownlee (0796)

Should retain the old houses and wards as they are of historical interest and would convert into other uses.

Frances Guy (0589)

Unique trees need to be preserved. Area does not need more wealthy flats and houses and social housing could greatly benefit from being situated on such a site. Considers that different parts of the plan make different commitments for the site which collectively seem to add up to preserving trees, providing 35% affordable housing and encouraging mixed use. For clarity provisions need to be set out all in one place.

Grange/Prestonfield Community Council (0192)

Support principles but consider timing is uncertain and NHS Lothian must be urged to determine their long term need for this site. Consider that the Place Brief will be crucial and must be timely.

Hervé Saint-Amand (0276)

Concerned by the lack of explicit protection for the site's green areas. Policy only mentions a 15-meter protection area, which could mean woods would be razed. Crucial to preserve the area for wildlife. Applaud that the redeveloped site include a playground, but does not think it could compensate for the loss of wildlife areas.

Inverdunning (Hatton Mains) Ltd (0427)

Consider that the site not available in plan period with disposal on hold indefinitely due to funding issues with replacement facilities.

Jennifer Roe (0407)

Objects to Place 3 on the basis of the need to maintain this vital 'green lung' for community health and wellbeing. Priorities should be greenspace and community infrastructure in light of your place and wellbeing strategy, and the original bequest of the land to the NHS. The proposed 500 units of housing is excessive in a conservation area and will lead to increased traffic, congestion, noise and air pollution, safety risks at the new South Morningside school on Canaan Lane and on adjacent Woodburn Terrace.

Ian Ross (0423)

Consider that the site should be looked upon as an opportunity to create a new way of looking at development with a holistic approach taking in more than the opportunity to build houses. Health and wellbeing for the area and the city should be the first priority with various other constructions as well as housing.

Jan Hulme (0420)

Priorities should be greenspace, community infrastructure and then housing which is carbon neutral. Housing should be restricted to the existing footprint of current or previous buildings on the site. The density of the housing should be reviewed. Biodiversity should be valued, preserved and protected. Weight should be given to history and archaeology of the site. Place Brief needs to be undertaken thoroughly before any for plans for building development on the site are encouraged in any way.

Jane Dudman (0563)

Considers it is good to see the overall commitment to developing the site sympathetically however there is little detail about access to the site, given the planned increase in homes, and the impact this would have on local streets and residents which should be addressed and made clear as part of any public consultation on development of the site.

Janet Woolley (0470)

Support a Place Brief and acknowledge that some development, including housing, will be required in order to maintain the site and would like to see a mixture of housing tenures including affordable homes and cohousing as an 'affordable middle way' between high end properties and social housing and as an example of how communities can be created.

Jennifer Hall (0534)

Priority should be given to the contribution of the green space to Edinburgh achieving net zero, particularly recognising the importance of the existing trees and open space, improving the bio-diversity of the site, health and well-being of local residents, ensuring access to the site for leisure and recreation, development on site of sustainable facilities for community groups, including for health, education and creativity and workshops for local craftspeople and small businesses and development of mixed, affordable and sustainable housing using existing buildings where possible and at an appropriate density.

John Falconer (0401)

Considers the view from Blackford Hill to be crucial, and nothing must be built which interferes with the parkland appearance, or the very striking shape of the butterfly pavilions.

Considers that housing-led development is wrong. Priorities should be preservation of all trees, grass and shrub areas, listed buildings and butterfly pavilions. Should be adaption of existing buildings where possible for community use, and new housing limited to existing footprints or hard standing. Should be limitation on height and rights of way through the site should be preserved, and if possible enhanced.

Julia Caroline Higgitt (0067)

Development principles should not be driven by housing development. Priorities should be green space, community infrastructure and then housing. Plans do not consider the impact on the biodiversity. The proposed building is excessive, and buildings should at the very least be carbon neutral. Ideally any new development should only be permitted on the existing footprint of current buildings or recently demolished ones and any new build take account of the existing trees. Blue and green corridors should be prioritised and the site should be car free.

Considers that a full archaeological survey should be undertaken before any development is authorised. Existing rights of way across the whole site must be preserved. Provision of education, healthcare infrastructure and community facilities should be on-site. Supportive of daylighting the Jordan Burn but consider set back to be insufficient.

Kathryn Poolman (0574)

Site must be protected, and mature trees must be preserved. Site is an invaluable natural site with diverse plant and animal life. Any development should be limited and respect wildlife corridors and give space for local people to enjoy nature. Support the provision of appropriate play facilities. Keep development and noise to a minimum. Safeguard the views to the Blackford Hill to the south.

Living Streets Edinburgh Group (0486)

Site offers opportunity close to the city centre, excellent connectivity by foot, cycling and public transport. Principles should make it clear that development is to be car free apart from disabled and servicing provision. Layout and design should be at a human scale with walking at its heart.

Contributions must not only be for active travel infrastructure, which must clearly set out separate requirements for walking and cycling, but also existing nearby pedestrian infrastructure that will be subject to added use arising from the development.

Liz Glass (0645)

Generally supportive of the plan however, disappointed to see that under most of the specific sites a top priority is given to housing even within current green spaces.

Considers aims do not fit with the overall plans for the city to both improve its existing and increase green spaces. Considers that priority given to housing and proposed density does not fit with the overall plans for the city to improve and increase green spaces. Not clear whether housing would be allowed to increase the percentage of built environment. Tree preservation order should be respected. A specific aim for should include improving biodiversity and conserving the special landscape. There is mention throughout the plan of the need for green corridors yet the potential for connecting distinct green spaces through walking/cycling etc along green corridors is not considered.

For Astley Ainslie site there is no mention is made of these green corridors yet consider there is potential to connect the site to Midmar Paddock and the Hermitage & Blackford.

Maggie Carson (0105)

Development principles should not be driven by housing development. Priorities should be green space, community infrastructure and then housing. Plans do not consider impact on the biodiversity. The proposed building is excessive, and buildings should at the very least be carbon neutral. Ideally new development should only be permitted on existing footprint of current or recently demolished buildings and any new build take account of the existing trees. Blue and green corridors should be prioritised and the site should be car free.

Considers that a full archaeological survey should be undertaken. Existing rights of way across the whole site must be preserved. Provision of education, healthcare infrastructure and community facilities should be on-site. Considers a protected species assessment should be undertaken and that the site offers potential for green prescribing, arts based therapies, mindfulness and forest bathing.

Maciej Malaszuk (0179)

Site should be converted to a public park which would support net zero target. Development would have significant impact on local facilities. Health and wellbeing benefits of green space on site would outweigh one off cash injection from the sale of the site. Existing rights of way should be converted to accessible walking paths and cycle ways and existing historic building converted to public use. Does not agree with principles in Place 3.

Mark Ockendon (0419)

Suggests addition of new requirement at Place 3: "Protect the heritage of the area and retain clear views of the sky by restricting the height of new developments".

Michael Adrian Hall (0261)

Considers policy should not be housing-led and priority should be open space. New development should only be in zones that currently have buildings on them. All existing trees should be protected, capacity too great and buildings should be built to carbon neutral standards. A full archaeological survey should be required. 15 m buffer for Jordan burn too small, existing rights of way should be preserved and consider that there is enough space for an enhanced direct contribution on the site to education, healthcare



infrastructure and community facilities within any development, alongside the retained and enhanced existing greenspace.

Mr Roger Thomas (0345)

Considers the preservation and maintenance of the ancient boundary walls which cross the site essential to an understanding of the history and development of the site.

NatureScot (0528)

Generally support principles, particularly the clear emphasis on the need for a master plan. Site hosts natural heritage assets of importance and is a key element of landscape and townscape quality in The Grange. To maintain these assets and the benefits derived recommend that development principle b) is amended to include a requirement to assess visual context as well as landscape assets and to support consideration of opportunities to improve the site and its wider setting. Building on this principle c) should be amended to more clearly reference the importance of the tree and woodland assets on the site and clarify the role of this asset and the Tree Preservation Order in directing development of this site.

Neil Ross (0610)

Consider existing development represents a reasonable balance of buildings and open green space consistent with the Conservation Area character appraisal. Development of 500 housing units would intensify the density of buildings on the site and directly conflict with the character appraisal. Number of units should be reduced to fit within the footprint of existing and recently demolished buildings. Support the day-lighting of the Jordan Burn doubt that the suggested separation of 15m from any new development will be sufficient to provide protection in a severe weather event.

NHS Lothian (0596)

Supportive policy that encourages the redevelopment of the Astley Ainslie campus. Have worked closely with the Council to prepare a Place Brief and request that the Plan reflects this updated position.

Olwyn Alexander (0351)

Priorities should be greenspace and community infrastructure. Equity in access to green space must be maintained for this community. New development should only be permitted on the existing footprint of current buildings or recently demolished ones with heights / density of buildings matching that existing footprint. Existing Tree Preservation Orders for the site must be upheld. The proposed 500 units of housing is excessive in a conservation area and will lead to increased traffic congestion, noise and air pollution, and significant safety risks for children/families traveling on foot/ by bike to the new South Morningside school.

Patricia Willder (0205)

Considers that proposals for more housing development at Astley Ainslie and likely at Royal Edinburgh Hospital site in the future will add to the already dense urban area in

South of the city. Consider that the area is already suffering from current over development of high end housing and any proposals need to consider the need for more affordable homes in on available brownfield sites only. Considers it will increase transport difficulties for commuters and consideration should be given to transport.

Peter Edwards (0601)

Believes Place 3 is in conflict with paragraph 2.28 of the Plan which states that "The City must also be ... proactive in ... maximising the wider benefits of nature through improving greenspaces and food growing opportunities as well as the accessibility of these spaces to enhance physical and mental wellbeing". Site is one of the very few significant areas of greenspace left in Edinburgh near the City Centre and its trees, flora and fauna are varied and worth protecting. Considers a large housing development would destroy the value of site. to the detriment of the whole city. Supports criteria (e) and (f).

Prof D N Bateman (0004)

The Astley Ainsley development should be carefully revalued to preserve green space for future generations. Considers the plan is not well developed and requires more detail. Development of a valued green area within the city seems contradictory to the green space policy in other parts of the plan. As the council wishes to reduce car use it must provide accessible local green areas

Richard Beauchamp (0604), Ruth Beauchamp (0458)

Priority for site should be greenspace, community infrastructure and then housing. Considers that development should only take place on the footprint of existing, non-listed buildings. All buildings should be carbon neutral. The existing Tree Preservation Orders for the site must be upheld. Views from Blackford Hill of the site and its existing tree canopy and public access should be maintained. Consider 500 units to be excessive.

Considers that a full archaeological survey should be undertaken before any development is authorised. Existing rights of way across the whole site must be preserved. Considers a protected species assessment should be undertaken. Supportive of daylighting the Jordan Burn but consider separation of 15m from any new development is insufficient.

Richard Doake (0436)

Generally supports the principles of the relevant policies, but the considers that capacity is incompatible with maintaining the landscape and special character and would limit the effectiveness of the site as an open space

Robert Falcon (0640)

Considers that to preserve the site development should be limited both in density height. Support a development of no more than 500 units. Building heights should be lower than existing buildings and trees, and therefore limited to 4 storeys only.

Sally Kerr (0435)

Detail provided is insufficient and does not protect site from significant change. Consideration of current public use of the site should be highlighted in terms of the health and wellbeing it provides. An extensive development will add to an already busy area and cause social and environmental change which must be addressed in the Place Brief. There is a need for a protected species assessment. Impact on biodiversity should be considered.

Scottish Wildlife Trust Lothian group (0560)

Tree Preservation Order for the entire site should remain. Site contributes to an important sense of place to the residents of the city which should continue. Welcome biodiversity policies expressed in plan that developments must enhance existing biodiversity. Support the enhancement of the environment and for this to be at the heart and at the start of all plans for site. Reducing the need for cars should be integrated into the thinking for this site which is especially important for the high number of houses proposed. Spirit of the NHS site should remain.

Sergey Gorobets, (0414)

Site should be preserved as much as possible for the community. Development must not be housing-led as it would add no value. Green space should be preserved re-purposing buildings or replaced by what the community badly needs - schools, nursery, community centre, sport centre, playgrounds.

Shelagh Sharp (0111)

Concerned that enough appropriate affordable housing is integrated in all the developments and not separated into different sites, thinks it is important to have mixed communities. In the case of Astley Ainslie important to keep the through links for cyclists and pedestrians and the open green areas for the benefit of the local communities.

Simon Thomson (0248)

The City Plan sets out 'Place-based' policies which appear to be development briefs for various parts of the city. A number of these briefs refer to specific sites which are not going to be available during the plan period or on sites which have existing businesses. These should be removed and the briefs retained as guidance only for sites coming forward as windfall opportunities.

Tom Proudfoot (0740), Teresa Fernandes (0194)

Priority for site should be greenspace, community infrastructure and then housing. Considers that development should only take place on the footprint of existing, non-listed buildings. All buildings should be carbon neutral. The existing Tree Preservation Orders for the site must be upheld. Consider 500 units to be excessive.

Considers that a full archaeological survey should be undertaken before any development is authorised. Existing rights of way across the whole site must be preserved. Provision of education, healthcare infrastructure and community facilities should be on-site. Considers a protected species assessment should be undertaken. Supportive of daylighting the Jordan Burn but consider separation of 15m from any new development is insufficient.

Provision of education, healthcare infrastructure and community facilities should be on-site.

William Brotherston (0754)

Grounds are of great importance to the community and continued access, rights of way and tree preservation orders should be retained. Any development should be focused on provision of facilities for the community, such as nursery schools, provision for physical, recreational and creative activities for young and old, community gardens, cafés, etc. continuing the health-centred uses. Hope there will be a range of housing including affordable and sheltered housing and that their placing and density will not diminish the sense of natural space. Consider 15 metres between new buildings and the Jordan Burn to be too close. Archaeology of site should be investigated.

William Mason (0438)

Believes site should not be considered for development but managed as part of a green network linking Blackford Hill and the Braids to the centre of the city via the Meadows. This would have the possibility of making the southern part of the city into a green corridor linking the wider countryside with the city centre. Considers that as written, the primacy given to development appears to foreclose this option. Considers that the allocation assumes NHS disposal and that this is not considered to be the case.

William Moyes (0305)

Need to be clear about how much current green space will be used if the strategy is fully implemented. Substantial proportion of the current greenspace should be retained as public open space and its use tightly controlled to prohibit gatherings, concerts, hospitality facilities during the festivals. Walking should be given priority. Provision for cycling and wheeling should be limited and directed off-site. Any new development should be of a high standard of design and construction. All buildings should be carbon neutral or better. The majority of new buildings should be houses, not just flats. All properties should have dedicated charging points for electric cars. The siting of any new build should protect the existing trees and allow access for maintenance of trees and grounds. There should be no wild areas. The existing Tree Preservation Orders for the site must be upheld. The strategy should make clear that existing rights of way across the whole site will be preserved. Development and infrastructure will reduce greenspace and final version of the strategy must show how much land would be devoted to housing and associated infrastructure, to facilities for education, healthcare and community activities and to public open space.

**H1 Dundee Street and H2 Dundee Terrace**

E Ritchie and D Melrose (0430)

Have concerns over drainage and that consideration may be given to further homes being built on site H1 and H2 (Dundee Street and Dundee Terrace) thereby increasing stress on an already overstretched system.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

#### SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment is required. Note that the sites are close to the Union Canal at a location which has experienced flooding from this source. Consideration should be given to the risk the canal poses. Site layout and design should take account of this risk. Consider including this source of flooding within the Site Assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

#### Simon Thomson (0248)

Suggest sites should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

### **H3 Chalmers Street**

#### Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

#### Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

#### SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

### **H4 Dalry Road**

#### Dalry Local Residents (0267)

Do not support the existing plans but would fully support if specifications were included the text. Views from Dalry Park should be retained. A new road facing square would provide for activity with residential above. A link path would complement existing plans for the park and connectivity. Suggests extension of the site footprint by extending into under used car park.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment is required. The Union Canal is elevated above the site but is 350 metres away from site. Recommend that contact is made with Scottish Canals.

**H5 Roseburn Street**

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

Murrayfield Community Council (0146)

Support conversion to housing but concerned to see that there should be very specific proposals for the developer to fund improvements to Roseburn Park in order that there should be adequate provision of high-quality open space.

SEPA (0012)

SEPA ask that consideration is given to changing Appendix D to require a flood risk assessment. A strategic flood risk assessment (SFRA) for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer. The draft SFRA mentions significant

flooding adjacent to the development and a flood risk assessment is required with consideration given to blue/green opportunities. This should be consistent with the requirements requested in H6.

### **H6 Russell Road (Royal Mail)**

#### Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

#### Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

#### Murrayfield Community Council (0146)

Support conversion to housing but are concerned about specific proposals for the developer to fund improvements to Roseburn Park in order that there should be adequate provision of high-quality open space.

#### Royal Mail Group Limited (0501)

No short, medium- or long-term interest or intention in relocating delivery office to an alternative location. The housing allocations proposed not considered to be deliverable and should be removed.

Express concern that new residential development will result in noise complaints and seek to ensure mitigation in order that Royal Mail operations are not negatively impacted.

#### SEPA (0012)

SEPA ask that consideration is given to changing Appendix D to require a flood risk assessment. A strategic flood risk assessment (SFRA) for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer. The draft SFRA mentions significant flooding adjacent to the development and a flood risk assessment is required with consideration given to blue/green opportunities. This should be consistent with the requirements requested in H5.

### **H7 Murieston Lane**

#### Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

Nick Johnstone (0368)

Submits comments on behalf of the landowner of properties 3,4,5,7,8,9,10 and 11 Murieston Lane. Owner has no intention of selling these for development and asks that these are removed.

SEPA (0012)

Agree with proposed Plan Appendix D. A flood risk assessment is not required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer when any pre-planning enquiry or planning application is made.

### **H9 Falcon Road West**

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required for this site.

### **H10 Watertoun Road**

Andrew and Alison Ferguson (0429)

Accept that the site is suitable in principle for housing however capacity would have a negative impact on the character and residential amenity of the surrounding area. Refers



to planning application 21/03813/FUL. Express disappointment that capacity of 72 units set out in plan disregards objections on density in relation to this. Consider that capacity of 72 units could only be accommodated if no amenity space were provided.

Dr Y Wang (0522)

Object to the capacity. Considers that the density will result lack of amenity for new residents in terms of recreational and environmental provisions. Considers that local schools are overcapacity and there are other deficiencies regarding amenity. Current density will provide buildings of no aesthetic value to the detriment of the and exacerbate damage to ecology. Traffic and parking problems will increase.

Grange/Prestonfield Community Council (0192)

Support in principle but should reduce capacity to 49 in line with planning application 21/03813/FUL.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

### **H11 Watson Crescent Lane**

Patricia Gray (0608) – support

Fully welcome the designation of the site for a housing development and would welcome guidance on forming a long term brief for the site.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment is required. The site is directly adjacent to the Union Canal. Consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Consider including this source of flooding within the Site Assessment.

## **H12 Temple Park Crescent**

Yinshuang Ding (0086)

Consider 5 storey building will impact on sunlight to properties. Would accept lower height.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. However, the site is directly adjacent to the Union Canal. Consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Consider including this source of flooding within the Site Assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

## **H13 Gillespie Crescent**

Brenda Rowan (0488), Nick Sherington (0500)

Object to H13 as not consistent with the Conservation Area Character Appraisal. Concerned about loss of landscape features, loss of green space and its impact on drainage, traffic, loss of privacy, light, noise.

Gabriela Medero (0022)

Does not support H13 as site is historical building that should be kept. Concerned about change to the character of the road and affect safety, traffic and noise.

George Goussetis (0269)

Considers that site is in an already dense area and will substantially deteriorate Gillespie Crescent, which already suffers from lack of parking area for residents. Concerned about strain on local facilities and considers there is no practical way of making a new housing development while also respecting the character of the neighbourhood.

Inverdunning (Hatton Mains) Ltd (0427)

Site is currently sheltered housing owned by Viewpoint Housing Association and no confirmation as to future plans so this requires clarification.

Louise Blanke (0675)

Considers density of proposed building would have a negative effect on the visual appeal of Gillespie Crescent and increase traffic and parking issues. Concerned about loss of trees, overlooking and impact on trees.

Luke Treadwell (0748)

Considers that the proposal will change the character of the crescent, increase traffic and remove Viewpoint complex, which is a socially valuable housing project. No detail provided on proposal.

Sandy Ramsay (0026)

Considers site should not be included as no consent from landowner.

Shona Simon (0242)

Concerned by potential scale of development and this should not go above the current height of the buildings and be well back from boundary walls, with appropriate screening with trees etc. Consider the area is dense and development would have impact on balance of green space.

Steve Garrett (0359)

Unclear why site has been included and should be removed.

Tollcross Community Council (0332)

Would like site removed as owners Viewpoint Housing Association have no intention of changing the use of their site and were not consulted about its inclusion.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required.

**H14 Ratcliffe Terrace**

Alix Speed (0043)

Concerned that the Council will approve planning for student accommodation. Would like some green space. Concerned about access to private garden during construction.

Felix Freund (0530)

Object to H14 as concerned development will not respect and match the design and uniqueness of the conservation area, impact on privacy, views, safety and noise. Current use by industrial and retail tenants provides the local community with shops, a petrol station and a garage. Ratcliffe Terrace and Causewayside are local retail centres in City Plan and this proposal would change the use of land covered by the proposal.

Grange/Prestonfield Community Council (0192)

Suggests expansion of site to include the whole of the area surrounded by Conservation Areas as likely to come forward for redevelopment within plan period, to encourage better place making and integration with adjacent neighbourhoods. Place Brief required.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

Margaret Newman (0697)

Concerned about light, views, overshadowing, privacy. Consider housing preferable to warehousing but building should not be higher than existing houses, set back from wall of their property with parking or landscaped garden on the other side of the 4 ft. high wall, and trees planted along the other side of the wall.

SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

### **H15 St Leonard's Street (car park)**

Julie McIlroy (0373)

Considers it is important that the current light and views to Salisbury Crags and Arthurs Seat are protected. Any development should be restricted in height and historical nature of the street needs to be protected. Should be dedicated parking.

Simon Paget-Tomlinson (0375)

Objects due to ability of site to provide capacity without compromising the units being built as well as the quality of life of the inhabitants of the surrounding area. Concerned about light, overlooking, privacy, over population, need for site to provide parking.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required.

Anne Binckebanck (0372)

Consider proposal would overcrowd area. Road would need to be widened and pavement provided. Would not be enough parking spaces, houses would be too close to Parkside Street and Hermits Croft resulting in loss of daylight and privacy. An old wall and trees would be destroyed, considers schools to be overpopulated and that there are issues with

water pressure. Would damage housing within a conservation area. Suggests using site for greenspace.

## **H16 Eyre Terrace**

### Jennifer Inglis (0437)

Considers it difficult to see how the statement that the expected number of units is only 245 is justifiable in the context of planning permission. The site should be moved into the "larger site" category of the document. Consider it foreseeable that site could be subject to further applications therefore the site should be subject to a place brief. The list of items in Appendix D is inaccurate. There is an incorrect reference to views down Dundonald Street. Important to protect view down Dundonald St and the northern part of Nelson St. Items that should be added to the appendix with respect to H16 include replacement of trees, treatment of Fettes Row, greater clarity on what 5m from mature trees means, state that there are a number of listed buildings, building height should be restricted.

Considers that the adjacent King George V Park is smaller than is listed in Open Space Audit of 2016. Future development should provide 20% usable green space not just open space as area is deficient in good quality large usable green space. Open Space policy should be specified in Place Brief. Should specify impact on sunlight as well as daylight. Value of another connection through the park is dubious. The high quality boundary treatments should be preserved. The trees on Fettes Row and Royal Crescent should be preserved, the height and massing should reflect the adjacent buildings, an active fronting onto Dundas St can still be achieved with new tree planting on Dundas St. Site should be natural sandstone, there should not be glass roof terraces or pavilions creating an extra usable floor, roofs should be pitched using natural slate. More careful attention to the way that sewage will flow through the site and not back up is required. New outdoor play should be provided because the play areas are very limited.

### Mr Gareth J Roberts (0335)

Considers there is insufficient detail. Concerned about traffic congestion, safety, impact on open space, road drainage, sewers and flooding, noise, proximity to dwellings and local building resilience.

### New Town and Broughton Community Council (0254)

City Plan 2030 (Appendix D) states inaccurately that the site is only likely to have 240 housing units. Would be helpful to develop a Place Brief for this site as soon as practicable so that any future applications would continue to support retention of some non-residential uses. Would not support more residential development on this site. A Place Brief would ensure that any future development had clear guidance for any further development proposal.

### SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues

within/adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

Wendy Johnson (0002)

Concerned that H16 will overwhelm area, increase traffic and residents and impact on daylight to existing properties. Consider that local facilities are already strained. Suggests using land to extend George IV Park.

**H17 Eyre Place**

Alasdair Wilson and Gaelle Geveaux (0807)

Object to H17. Concerned about traffic congestion, parking, capacity of recycling and reduced light to gardens.

Alexandra Stevenson (0304)

Does not support proposal as considers it would cause unnecessary disruption to the area, create noise, block views, disrupt privacy. Considers space could be used for more beneficial community use.

Angela Ball (0277)

Concerned about structural impact to the properties on Rodney Place. No plans to show the impact to quality of life with loss of light and increased noise from the works and additional residents. No provisions for the impact on infrastructure. Consider the area lacks green space and site would be better used as a community garden or allotments. Owner of building to the rear of Rodney Place and there has been no approach or consultation from the Council. Building is used as storage, bicycle keep and safe and covered area to carry out any bike repairs. Consent should be obtained, or confirmation given of plans in place to ensure I can still make use of the active travel scheme in safety.

Cameron Prentice (0076)

Opposes the construction of housing units and considers there are more beneficial uses including outdoor, green community space with cafe and recreational area. Area already has a lot of high rise housing and more green space, vegetation and trees are crucial with increasing amounts of rainfall and flooding.

CASL Stanley Place Property Owner Limited (0737)

Request that allocation is amended to accommodate a mix of uses, such as Purpose built Student Accommodation, residential housing and other commercial uses. The site is located conveniently close to existing transport links, services and parks, University of Edinburgh, Napier University and Edinburgh College of Art. Considers there is not an over-concentration of students and other types of mixed-commercial uses would also be appropriate.

Charlie Clark (0790)

Cannot see need for site given proposal H16. Area cannot cope with more traffic or footfall and exit should be via Rodney Street. No detailed plans trust daylight, sunlight, privacy and outlook rules will be abided by. Parking must be provided on site and adequate drainage. Questions if local infrastructure cope. Concerned about height of units and impact on surrounding area.

Daniel Gough (0421)

Object to the proposed plans. Area is already severely overcrowded. Concerned about health provision, parks, noise pollution and impact of construction. Plans contradict a carbon neutral city. Area needs green spaces.

Dr Jane Gear (0487)

Considers proposal would be detrimental to residents bordering site. Considers there are limitations of the existing infrastructure, traffic congestion & parking, Eyre medical practice and other medical services. Consider that there is a need for recreational space. Suggest alternative uses for the site as allotments, a green meeting place for the elderly, pocket of city centre 'greening' and rewilding with plants and flowering plants.

E Roberts (0471)

Understand need for reusing brownfield sites and approve of the general plan however taller design of the housing on the north side of the of the site would mean four-storey buildings, which would significantly negatively impact the light and privacy of existing housing. Suggests development is of a lower level over the whole site and with decent set back from the property boundary to maintain existing light levels. Should be no additional on-street parking.

Ewan Gray (0103)

Not consistent with previous proposals. Concerned about increased traffic, safety, emissions and public services. Should prioritise a non-residential option, and suggests a green space, to be consistent with the city's proposed net zero plans.

Francesca Fiori (0390)

Residents of Rodney Street, Logan Street, Rodney place, Eyre Place and Eyre Place Lane will be heavily affected in socio-emotional and financial well-being due to impact on their privacy and reduce the amount of direct sunlight. Extra household will place strain on local services and increase traffic. Suggest using land to create a leisure/recreational community service and a car park for the exclusive use of electric vehicles.

Hannah and Chris Edwards (0696)

Oppose H17 due to concern around health and education provision, impact on light and privacy, parking, congestion, air quality, impact of construction on properties. Believe provision for electric vehicles car park could be a good option for the future.

Iain Leslie (0586)

Area already a high-density population. Resources already above capacity for the area. Introduction of 60+ homes alongside the approved development on Eyre Terrace will put excessive pressure on services and infrastructure. Many alternatives such as a larger health centre, primary school, or allotments, all of which would alleviate the capacity issue rather than exacerbate it.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Irene Kernan (0549)

Concerned due to impact on existing properties, impact on local health services, roads, transport, noise, volume of people. Worried about gradual closing in of the skyline and access to sunlight, and erosion of quality of green space. No intentions or policies to protect or care for existing residents.

Need mixed housing including low level housing suitable for older people, people with young families, accommodation for homeless people. Need for a health centre. Suggests developing site for allotments, sheltered facility or medical centre.

Lee Davis (0117)

Consider proposal would have negative impact on property, standard of living and community. Concerned about level of new building in the area and impact on traffic, community infrastructure, light to garden ground and poor bus service.

Lorraine Smith (0462)

Concerned about impact on daylight to existing properties, traffic and need for greenspace. Considers proposal compromises character of city.

Marton Feigl (0196)

Disagrees with allocation for housing. Considers that there have been numerous developments in the area which have unpleasantly densified it and design of new housing is destroying the character of the area. Should be used for community such as a park. Fears housing will be student accommodation.

Mr Gareth J Roberts (0335)

Considers there is insufficient detail. Concerned about traffic congestion, safety, impact on open space, road drainage, sewers and flooding, noise, proximity to dwellings and local building resilience.

New Town and Broughton Community Council (0254)



Estimated number of housing units on this site seems high. The proposal appears to include 25 Rodney Street, which provides both commercial and leisure facilities for the local residents. Believe that the proposal for 69 units is a significant overdevelopment of the site. Note that due to an anomaly, this area does not sit within either the New Town Conservation area nor the Inverleith Conservation area.

Sarah Roberts (0630)

Concerned about privacy, risk of flooding, drainage system, daylight, pressure on parks, congestion and oversubscribed services and risk to buildings in the conservation area due to existing subsidence in the area. Considers recent developments car parking rather than garden space. Creating a new green space would be a benefit to all residents.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown

Stephanie Stevenson (0793)

Proposal contradictory as it is stated that the purpose of building 69 units on the land is to accommodate affordable housing as 35% of that but considers that 24 affordable flats are going to make very little difference. Considers there is a lack of green spaces in the central area and would benefit from more green spaces. Concerned about impact of construction and would like timeline.

Theo Scott (0014)

Fully support the proposal and considers that the number of units should be increased, and consideration given to doubling the height of the proposed block.

Vanessa Steven (0755)

Objects to H17 Eyre Place (69 flats) dues to loss of light, overshadowing, loss of privacy, loss of view, traffic, community infrastructure and disruption from construction.

Vincent Meiklejohn (0069)

Considers proposal problematic and will cause parking issues, overlooking, impact on daylight, pressure on existing park. Suggest site becomes a park.

William Craigie (0186)

Considers that capacity of H17 should be reduced dues to flooding, traffic, pollution, access for emergency services, access to private garages, lack of community infrastructure and impact of construction.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. Based on LiDAR, the site is elevated approximately 7 metres above the banks of the Water of Leith. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

### **H18 Royston Terrace**

Amy Middlemass (0629)

Object to proposal as considers it will affect daylight to property.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Jonty Bredin (0682)

Oppose the proposals due to parking, congestion, noise, loss of sunlight/daylight, privacy.

Melissa Sharkey (0684)

Expresses concern due to traffic and parking, noise and disturbance, loss of sunlight and daylight and privacy.

Michal Rozynek (0626)

Object due to insufficient community infrastructure, parking, congestion, distance between buildings, overlooking, privacy and light. Suggest current height of buildings should be maintained and access maintained for emergency vehicles.

SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

### **H19 Broughton Road (Powderhall)**

SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment is required. Site is suitably elevated above the Water of Leith (>5metres above). Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

## **H20 Broughton Market**

Corline Elisabeth Scholes (0713)

Worried about a reduction in privacy, changes in building height or size of window would have direct impact. A less dense development with the same footprint and height as existing buildings and without substantial changes to windows would be preferable.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

Terry Levinthal (0313)

Considers that allocation of site presumes that demolition on a Conservation Area is acceptable. National and local policies and guidance make it clear that the presumption is in favour of retention of building that make a positive contribution unless significant mitigating factors suggest it is incapable of use. Site does not meet the policy test of Env 13 or Env 10 of City Plan. As such, this is not an effective housing site and should be deleted from the Plan.

Edinburgh World Heritage (0339)

Amend first bullet point in Appendix D to appropriately reflect its location within and need to conserve the World Heritage site.

## **H21 East London Street**

Amanda Michie (0217)

Oppose the plan for East London Street H21. There is no information on what is being built other than housing with business facilities underneath which suggests more tall

blocks of flats. There have been a number of new developments in an already congested area yet there is no corresponding increase in refuse or recycling facilities. Agree that Edinburgh should be accessible without the need to own a car but there needs to be a significant change in the attitude of residents and building housing without parking is not a solution.

Helen Sugden (0797)

Does not welcome proposed development for which there is little detail. Combined with an existing planning approval for Gayfield Square residents will be surrounded by new building works, facing many years of construction noise and traffic disruption. Will negatively impact visual amenity, natural light availability and quality of life for residents and introduce additional traffic danger for school. The quality and density of any proposals is also worrying. Much of what has been approved appears inconsistent with the constraints of New Town development and wishes details of how these significant issues will be addressed.

Inverdunning (Hatton Mains) Ltd (0427)

Consider that site should be reduced in size with amended capacity as site is part-owned by Lothian Buses which may come forward but part-owned by a mosque with no confirmation of disposal.

Italian Consulate General for Scotland and Northern Ireland (0320)

H21 covers an area that extends to the outer boundary of No. 20-22 East London Street which houses the offices of the Consulate General of Italy for Scotland and Northern Ireland and the Institute of Culture in Edinburgh. It has been granted consular/diplomatic status. The Italian State is the holder of exclusive property rights to the strip of land highlighted in pink in and non-exclusive right of way which are included in the H21. Request that the boundaries of the area be redefined in such a way as to preserve the rights acquired by the Italian State over the strips of land on account of the immunities, exemptions and privileges. A reasonable level of security must be ensured by means of an external perimeter which provides a sufficient area of separation from other buildings.

Jennifer Newton (0679)

Street character needs to be preserved without a huge dominant building at one end. Proposed density is too high. Any building should not increase the existing building height. There is no parking provision envisaged and traffic too heavy for the width of this road. Any building should be set back to line up with the rest of East London Street and should not be dominant.

Nigel Sedgwick (0680)

Objects to allocation as considers density too high and that building heights should not change the existing character of East London Street. In particular, the heights of the nearby mosque and community centre should not be exceeded by any significant margin that would dominate those existing buildings.

SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required.

Thomas Unter (0204)

Considers the capacity is excessive and should be revised down and that consented development in the area should be taken into account in reducing capacity. Consider that building massing would dominate East London Street northern aspect and any proposal should seek to minimise the scale and height of the development to reflect the existing height and nature of the site and significant public realm improvements needed.

**McDonald Road (B) H22**

Blandfield Residents Association (0426)

Consider site is constrained with poor access. Site has existing businesses that provide local employment, church / community hall and in line with Scottish Government policies on 20 minute neighbourhoods a mixed use should be retained. Considers area has seen extensive conversion to housing, without corresponding investment in amenities. Public transport services are limited and existing parking options are constrained. Overdevelopment should be avoided. Concerned about existing greenspace and capacity of development to provide green space. Development of the site must take account of access to the Powder Hall railway as a cycle track. Would consider withdrawing objection based on details related to density, green space provision, parking provision and access to the cycleway. Issues concerning the site boundary, boundary wall ownership and impacts of construction on this structure must be resolved before development.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

SEPA (0012)

Agree that a flood risk assessment should be requested as set out in Appendix D. Review of historic maps indicates the Broughton Burn may be culverted beneath the site. A flood risk assessment which assesses the risk from this source is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

**H23 McDonald Place**

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

SEPA (0012)

Agree with Proposed Plan Appendix D. No flood risk assessment (FRA) is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

**H24 Norton Park**

Annie McIntyre (0802)

States that there has been no environmental impact assessment of the proposed plan and no mention of the diversity of habitats flora and fauna in the proposal other than in an overall aim of the Plan.

Consider that the area has been subject to intense building, population and traffic increase with no proper infrastructure or landscape impact consideration given.

Consider that due to the pandemic there has been no proper consultation and building has continued with no provision for new schools or GP services.

Consider the density of buildings, and layouts plus the design and appearance of materials do not appear to take into account the existing residences and communities, paying only passing commentary on listed buildings. Consider that the importance of trees and woodland to quality and character of urban areas are not in evidence.

Chris Byrne (0297)

Considers that proposal should be sensitive to the area and in keeping with existing buildings. Refers to recent construction of towers blocks which have changed the character of the area and object to this approach. Support access to the proposed active travel corridor along the Powderhall Railway and principle of any development being in keeping with and enhancing the nearby conservation area and listed buildings.

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken

an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

SEPA (0012)

Agree that a flood risk assessment should be requested as set out in Appendix D. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer. The draft Strategic Flood Risk Assessment and Appendix D identified the opportunity for a strategic SUDS basin to manage surface water on site and to assist with reducing surface water flood risk in the area.

## **H25 London Road (B)**

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

SEPA (0012)

Agree that a flood risk assessment should be requested as set out in Appendix D. Cannot discount the potential for a culverted small watercourse within or immediately adjacent to the site, however review of historic maps does not clearly identify any. This may require further ground investigation. Flooding reported in 2018 on London Road adjacent to the allocation. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. The surface water flood map is picking up low points associated with Clockmill Lane.

## **H26 Portobello Road**

Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

#### SEPA (0012)

The draft Strategic flood Risk Assessment does note that a watercourse may exist here while a review of historic maps does not indicate a small watercourse on site. Any applicant must establish whether or not there is a small watercourse which may have been in culvert when the historic maps were compiled. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

#### **H27 Willowbrae Road**

##### Inverdunning (Hatton Mains) Ltd (0427)

The site is potential windfall site which should not form specific housing proposal. No contact has been made with site owners by Council and state that they have undertaken an exercise which indicates a strong opposition to releasing sites from existing business use. Timescale and resource for CPO not deliverable within the plan period.

##### Simon Thomson (0248)

Suggest site should be removed along with a number of other housing allocations as either being unavailable or currently occupied by trading businesses with timescales for disposal unknown.

#### SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. The site is out with the Braid Burn or Figgate Burn Flood Protection Scheme. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer. The draft SFRA mentions consideration of blue/green corridors.

#### **H28 Cowans Close**

##### Inverdunning (Hatton Mains) Ltd (0427)

Consider that site should be reduced in size with amended capacity as part-owned by the Council and part-owned by a retail unit owner with no confirmation of disposal.

##### Ruth Buchanan (0083)

Fully support the development of housing at H28 in terms of housing need however unclear if the issue of parking has been considered. Support the views of Southside Community Council in terms of reducing cars however for some people a car is an



essential and therefore assume that the Cowan's Close development will generate a need for further parking availability.

#### SEPA (0012)

Agree with proposed Plan Appendix D. No flood risk assessment is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further, and it is recommended that contact is made with the flood prevention officer.

#### **Modifications sought by those submitting representations:**

##### **General**

#### New Town and Broughton Community Council (0254)

No modification specified.

##### **Place 1 – Edinburgh City Centre Policy**

#### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Amend text of Place 1 to:

“Planning permission will only be considered for development which lies within the area of the City Centre as defined on the Proposals Map and which at a minimum retains and enhances its character, attractiveness, vitality and accessibility and contributes to its role as a strategic business and regional shopping centre and Edinburgh’s role as a capital city.”

And apply to all Places and policies that contain the same initial phrase.

Infers amendment of paragraph 3.11 to make primary requirement for housing.

#### Archie Clark (0003)

Infers provision of parking

At paragraph 3.10 and 3.12 include integration with tram and bus networks.

Provide for pedestrian crossings on Princes Street.

Provide for an underground car park on George Street.

#### Aviva Life and Pensions UK Limited (0598), LaSalle Investment Management (0262), The Institute of Chartered Accountants of Scotland (0182)

In Place 1 make reference to the fact that development of a significantly higher density, and potentially taller height, should be designed for scarce, brownfield city centre development sites such as Rosebery House and those in the Haymarket area, to ensure that their potential is realised, subject to prospective applicants demonstrating that there

would be no adverse impact on existing uses, the city skyline, key views and surrounding amenity, as required.

Cockburn Association (0777)

Amend Place 1 to include reference to other policy objectives such as protecting the special characteristics and outstanding universal values.

Cynthia Shuken (0632)

No major development in city centre or Morningside.

Edinburgh Chamber of Commerce (0379)

No modification specified.

Edinburgh World Heritage (0339)

At para 3.3 include reference to the importance and method of engaging the local community and wider stakeholders in the development of principles for development of their areas.

Amend paragraph 3.6 to "...the right balance between several co-supporting and sometimes competing"

At 3.10 amend third bullet to:

"Opportunities to enhance the retail, leisure, community and cultural experience on Princes Street"

Amend first paragraph of Place 1 to:

"...enhances its character, heritage values, attractiveness, vitality and accessibility and contributes to its role as a World Heritage Site, a strategic business and regional shopping centre..."

Amend Place 1 (b) to:

"...topography, accessibility characteristics, heritage values and the historic or otherwise positive character of the surrounding area."

Amend 3.11 to:

"...of a high quality of design and taking account of the characteristics of the historic environment to protect and enhance the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site."

Elgin Haymarket Limited (0292)

Request that the Haymarket District is included as a strategic city centre 'Place' in Central Edinburgh Place 1.

#### Central Edinburgh Place 1b: Haymarket District

Planning permission will be granted for development within the boundary of Haymarket District as defined on the Place Map (see Figure 1) provided it accords with the Haymarket District Development Principles, and the approved or subsequently approved master plan. Located in the west of the city centre, just beyond the World Heritage Site and conservation area boundaries (see Figure 2), Haymarket District includes Haymarket Station and tram stop, national cycle and core paths routes, M&G's Edinburgh Haymarket, Rosebery House, Osbourne House, Cosla, the site of the proposed PBSA, Elgin House and Royal London. Comprehensive office led mixed-use development is encouraged, and already underway at Edinburgh Haymarket.

Haymarket District Development Principles:

- a. create layouts which integrate with adjoining developments;
- b. improve east-west linkages along Haymarket Yards as an active travel route and linkages north to Haymarket Terrace as a strategic corridor;
- c. turn Haymarket Yards into a local 'active' street frontage in accordance with the Edinburgh Design Guidance;
- d. proposals should explore potential to provide attractive frontages and arrivals to the tram network/Haymarket Station, safeguarding heritage and any listed buildings;
- e. proposals should also take the opportunity to enhance the use, physical appearance and linkages to/from the national cycle and core path networks, supported by a low vehicle speed environment, improving public realm;
- f. contribute to wider zero carbon and wellbeing objectives;
- g. protect and enhance key townscape views, and help determine appropriate densities, through townscape and visual assessments;
- h. encourage higher densities on brownfield sites close to public/active travel hubs; and
- h. provide or contribute towards transport infrastructure and community facilities.

#### Hazledene House Limited (0695)

Strategy should seek to address:

- The future role of Princes Street and the level of vacancies at all floors.
- The shift of the focus of retail within Edinburgh away from Princes Street to the Eastern End of the City Centre and the new St James Centre
- Rose Street and connecting streets and the opportunity to make better use of the lanes between them. Recognise that selective demolition to remove redundant buildings could assist in delivering a greater mix and density of uses and provide opportunities for new permeability and greater use of the lanes

#### Mark Ockendon (0419)

Include provision for new greenery, whether trees or other planting in all policies.

#### SEPA (0012)

At Place 1 (c) include specific reference to green/blue infrastructure as part of the station upgrade, capturing water nearby.

Living Streets Edinburgh Group (0486)

Amend paragraph 3.8 to:

"To achieve these outcomes, the allocation of street space will be rebalanced to reflect the transport hierarchy with walking prioritised...."

Infers removal of 'achievable' from Place 1 (d)

Melford Developments Ltd (0308)

Provide more flexibility within Policy Place 1

Review Map 12, page 43 Edinburgh City Centre in relation to boundaries.

Nuveen Real Estate (0564)

At paragraph 3.11 explicitly acknowledge that activation of the city centre's publicly and privately owned external spaces represent an opportunity to provide a diversity of uses and activities, generate additional footfall for the city centre and as such maintain and enhance the vitality of the retail offer in the city centre.

Southside Community Council (0781)

At Place 1 (d) strengthen wording about ambition to create new civic spaces and traffic free zones.

West End Community Council (0692)

Include a specific place plan for the West End.

## **Place 2 – Fountainbridge**

Cockburn Association (0777)

Include an additional statement supporting the vertical integration of uses in each development area.

Janet Woolley (0470)

No modification specified.

Living Streets Edinburgh Group (0486)

At Place 2 include separate not shared pedestrian and cycle links, and statement that with any other required works they remove not reduce the barrier effect.

Mark Ockendon (0419)

At Place 2 (g) add "including clear views of the existing skyline by restricting the height of new developments"

#### SEPA (0012)

Explore discharge of surface water to the canal if the potential for the risk of flooding from the canal be ruled out.

#### **Place 3 and H8 Astley Ainslie**

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jan Hulme (0420), Jennifer Hall (0534), Jennifer Roe (0407), Julia Caroline Higgitt (0067), Neil Ross (0610), Olwyn Alexander (0351), Richard Beauchamp (0604), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740), William Brotherston (0754), Michael Adrian Hall (0261)

At Place 3 (a) reorder priorities - greenspace, community infrastructure and then housing.

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jan Hulme (0420), Jennifer Hall (0534), Jennifer Roe (0407), Julia Caroline Higgitt (0067), Olwyn Alexander (0351), Richard Beauchamp (0604), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Teresa Fernandes (0194), Tom Proudfoot (0740), Michael Adrian Hall (0261)

Amend place 3 (b) to: Any new development will only be permitted on the existing footprint of current buildings or recently demolished ones. Any new build take account of the existing trees which must be protected. The existing Tree Preservation Orders for the site must be upheld.

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jan Hulme (0420) Jennifer Hall (0534), Jennifer Roe (0407), Julia Caroline Higgitt (0067), Olwyn Alexander (0351), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740),

At Place 3 (c) add "all buildings should be carbon neutral".

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Maggie Carson (0105), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Peter Edwards (0601), Richard Beauchamp (0604), Ruth Beauchamp (0458), Sally Kerr (0435), Tom Proudfoot (0740), William Brotherston (0754), Michael Adrian Hall (0261)

At Place 3 (d) require a full archaeological survey before any development of the site is approved.

Annie Bell (0136), Astley Ainslie Community Trust (0318), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Teresa Fernandes (0194), Tom Proudfoot (0740), Richard Beauchamp (0604), Ruth Beauchamp (0458), Michael Adrian Hall (0261)

At Place 3 (f) change 15 m to 50m.

Alison Stoddart (0658), Annie Bell (0136), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Maggie Carson (0105), Peter Edwards (0601), Richard Beauchamp (0604), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740), Michael Adrian Hall (0261)

At Place 3 (h) state that existing rights of way across the whole site must be preserved.

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Maggie Carson (0105), Teresa Fernandes (0194), Tom Proudfoot (0740), Michael Adrian Hall (0261)

At Place 3 (i) require provision of education, healthcare infrastructure and community facilities on-site.

Alison Stoddart (0658), Annie Bell (0136), Archie Clark (0003), Astley Ainslie Community Trust (0318), Jennifer Roe (0407), Juniper Green & Baberton Mains Community Council (0306), Michael Adrian Hall (0261), Olwyn Alexander (0351), Richard Beauchamp (0604), Ruth Beauchamp (0458), Teresa Fernandes (0194), Tom Proudfoot (0740), William Brotherston (0754)

Implies that capacity of site should be reduced.

Andrew Gray (0388)

No new development within Astley Ainslie.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

At Place 3 include readable map.

Infers retention of hospital provision.

Use bullets rather than numbers

Include an example of mobility hubs in glossary.

Astley Ainslie Community Engagement Group (AACEG) (0275)

Place 3 at paragraph 3.14 change lines 4 & 5 to "Once approved the Place Brief will become planning policy."

Place 3 (b) add "The location, design and building of new houses must respect and protect the existing trees and their protected root zone."

Place 3 (h) Replace "Provision of several pedestrian/cycle routes through the site...." with "Preserve the existing rights of way as pedestrian/cycle routes through the site...."

Place 3 add additional principles

1) "The proportion of new housing that is affordable and/or for social rent must be at least

the current statutory proportion (35% in 2021).

2) "Affordable housing should all be on-site in the Astley Ainslie not located elsewhere".

3) "All buildings on the site should be built or renovated to the highest environmental standards so as to be carbon neutral and, if appropriate, linked to a shared ecological heating system.

4) "Any new development must not appear as an intrusive or alien feature in the views from Blackford Hill across the Grange and towards the city centre skyline. These views are precious and new development should sit comfortably and harmoniously in its setting."

Provide sufficient primary and secondary school places and primary care facilities.

Provide public transport from within the site to local shops in Morningside and the city centre.

Within Appendix D H8 require a protected species survey.

At Table 1, page 150 BGN23 add "New building and digging of trenches should avoid the root protection area of the established trees."

At Table 1, page 150 BGN23 include the preservation and maintenance of the ancient boundary walls which cross the site.

At Table 2 Housing Proposal H8 change "once approved the Place Brief will become non-statutory planning guidance." to "Once approved the Place Brief will become planning policy".

#### Cockburn Association (0777)

At Place 3 (a) replace "respects the mature landscape setting of the site" with "preserves the mature landscape setting of the site".

#### Colin Fraser (0106), Maggie Carson (0105), Sergey Gorobets (0414)

At Place 3 (a) remove "housing led"

#### Dave Berry (0463)

Amend Place 3 (e) to "outdoor play and exercise space facilities needed on site to ensure all new homes in the development and the surrounding area are adequately served by play areas in line with the requirements of the Council's Open Space strategy".

#### Fiona Brownlee (0796)

At Place 3 require retention of buildings.

#### Frances Guy (0589)

Set out priorities of the plan for site in one place.

Grange/Prestonfield Community Council (0192)

No specific modification suggested but infer that at Place 3 timing of development should be set out.

Hervé Saint-Amand (0276)

At Place 3 (f) provide stronger protections for the existing woodland areas

Ian Ross (0423)

Amend Place 3 to provide for community led development.

Inverdunning (Hatton Mains) Ltd (0427)

Delete H8

Jan Hulme (0420)

At Place 3 give weight to history and archaeology.

Review capacity of site.

Require Place Brief before encouraging development.

Jane Dudman (0563)

At Place 3 provide more detail on access to the site.

Janet Woolley (0470)

No modification specified.

John Falconer (0401)

At Place 3 (a) remove housing led and state priorities as 1) preservation of all trees and all grass and shrub areas to keep the parkland character, 2) preservation of listed buildings and butterfly pavilions 3) adaption of existing buildings, where possible, for community use.

At Place 3 (b) add construction of new housing only on brownfield parts of the site where modern buildings have been pulled down, or which are already car-parks or similar. New housing should be of very limited height and should not disturb the view of the parkland and butterfly pavilions from the top of Blackford Hill.

At Place (i) add:

“All current rights of way through the site should be preserved, and if possible enhanced.”

Infers capacity should be reduced.



Kathryn Poolman (0574)

Limit development and respect wildlife corridors and provide space for people to enjoy.

Safeguard the views to the Blackford Hill.

Living Streets Edinburgh Group (0486)

At Place 3 include:

- development is to be car free apart from disabled and servicing provision.
- The layout and design should be at a human scale with walking at its heart.
- Contributions for active travel infrastructure and existing nearby pedestrian infrastructure

Liz Glass (0645)

Include a specific aim to improve biodiversity and conserve the special landscape.

Address green corridors.

Maciej Malaszuk (0179)

No modification specified but implies change should be made to principles of Place 3.

Maggie Carson (0105)

Implies that Place 3 (b) should include reference to repurposing existing buildings rather than new buildings and require preservation of views from Blackford Hill.

At Place 3 (g) prioritise blue and green corridors and require site to be car free.

At Place 3 (i) include requirement for consultation to ensure that provision is adequate for all in the immediate area and adjacent neighbourhood/town centre.

At Place 3 add requirement for protected species assessment.

Mark Ockendon (0419)

At Place 3 add new requirement: "Protect the heritage of the area and retain clear views of the sky by restricting the height of new developments"

Mr Roger Thomas (0345)

At Table 1, page 150 expand BGN23 to include the preservation and maintenance of the ancient boundary walls which cross the site.

At Place 3 (c) include that the old stone boundary walls which cross the site should be preserved and maintained.

At Place 3 (f) clarify if this means exposing of currently culverted sections of the Jordan Burn.

NatureScot (0528)

Amend Place 3 (b) to:

“Determination of the location, scope and scale of development through a thorough assessment of the landscape, visual and heritage assets and opportunities of the site.”

Amend Place 3 (c) to:

“The extensive woodland, which is covered by a whole site Tree Preservation Order, should inform the location, design and density of development.”

Neil Ross (0610)

At Place 3 (c) any developments must be consistent with the Conservation Area character appraisal.

NHS Lothian (0596)

Update Plan to reflect that a Place Brief has been prepared.

State in supporting text that Place Briefs will be created in partnership with NHS Lothian.

Patricia Willder (0205)

No modification specified.

SEPA (0012)

No modification specified.

Peter Edwards (0601)

At Place 3 (a) change priority to green space and nature conservation, not housing.

At Place 3 (b) any housing should be restricted to the footprint of existing buildings.

Prof D N Bateman (0004)

At Place 3 provide more detail and revalue approach to preserve green space.

Robert Falcon (0640)

At Place 3 include reference to density.

Sally Kerr (0435)

At Place 3 (e) consider opportunities for innovation in play facilities with consideration of their sustainability and how they sit in the environment.

Scottish Wildlife Trust Lothian group (0560)

At Place 3 (b) the TPO for the entire site should remain.

At Place 3 include reducing the need for cars.

Shelagh Sharp (0111)

No modification specified.

Simon Thomson (0248)

Delete H8

Remove place policy and retain development principles as guidance only for sites coming forward as windfall opportunities.

William Brotherston (0754)

Infers principles should include reference to types of housing.

William Mason (0438)

Amend Place 3 to manage site as part of a green network linking the existing natural sites at Blackford Hill and the Braids to the centre of the city via the Meadows.

William Moyes (0305)

Retain substantial portion as public open space with use tightly controlled.

Give priority to walking.

Limit provision for cycling and wheeling.

Require new development to be of a high standard of design and construction and carbon neutral.

Set requirements for type of housing.

Require charging points for electric cars.

No wild areas.

Make clear that existing rights of way across the whole site will be preserved.

Specify how site can provide or contribute towards education, and healthcare infrastructure and community facilities alongside greenspace.

Richard Doake (0436)

At Section 4, Table 2 remove the capacity and have this determined through Place Brief.

### **H1 Dundee Street and H2 Dundee Terrace**

E Ritchie and D Melrose (0430)

No modification specified.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H1 and H2

SEPA (0012)

No modification specified

### **H3 Chalmers Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H3

SEPA (0012)

No modification specified

### **H4 Dalry Road**

Dalry Local Residents (0267)

Include the following specification in plan text:

1. Limited in height - one story less than properties on Dalry Road, same height as properties on the same side of the road, to retain views of historic Dalry and sun set from Dalry Park.
2. A new road facing square for public and tourist activity, cafes and seating with ground floor commercial units facing into the square supporting new businesses, employment and rates. Residential units above.
3. A link path from the back of the square to the park, connecting Dalry Road to the park via the square. Complimenting the existing plans for the park and connectivity across the city.
4. Extension of the site footprint, overall the development footprint actually increases even with the addition of the square and path. This is achieved by extending into the very under used car park, which at present is not a good use of the city centre space. Both the site and the carpark belong to the same owner so this should be feasible.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H4

SEPA (0012)

No modification specified

#### **H5 Roseburn Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H5

Murrayfield Community Council (0146)

No modification specified.

SEPA (0012)

At Appendix D require a flood risk assessment.

#### **H6 Russell Road (Royal Mail)**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H6

Murrayfield Community Council (0146)

No modification specified.

Royal Mail Group Limited (0501)

Remove H6 and re-allocated as Business and Industry Areas under Policy Econ 4 of the plan.

Or if H6 retained include at Appendix D reference to Royal Mail's operations and ensure that any necessary mitigation is to guarantee that there is no undue impact to Royal Mail.

SEPA (0012)

At Appendix D require a flood risk assessment.

#### **H7 Murieston Lane**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H7.

Nick Johnstone (0368)

Remove 3,4,5,7,8,9,10 and 11 Murieston lane from H7.

SEPA (0012)

No modification specified.

### **H9 Falcon Road West**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H9.

SEPA (0012)

No modification specified.

### **H10 Watertoun Road**

Andrew and Alison Ferguson (0429)

No modification specified but suggests removal of site or reduction in capacity.

Dr Y Wang (0522)

Reduce capacity.

Grange/Prestonfield Community Council (0192)

Reduce capacity to 49.

SEPA (0012)

No modification specified

### **11 Watson Crescent Lane**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H11.

SEPA (0012)

No modification specified.

### **H12 Temple Park Crescent**

Yinshuang ding (0086)

Reduce height of development.

SEPA (0012)

No modification specified.

### **H13 Gillespie Crescent**

Brenda Rowan (0488), Gabriela Medero (0022), George Goussetis (0269), Louise Blanke (0675), Luke Treadwell (0748), Nick Sherington (0500), Sandy Ramsay (0026), Steve Garrett (0359), Tollcross Community Council (0332)

Remove H13.

Inverdunning (Hatton Mains) Ltd (0427)

No modification specified but require clarification of intention for site or removal.

Shona Simon (0242)

No modification specified but suggest that building should be below the height of current buildings and adequate greenspace should be provided.

SEPA (0012)

No modification specified.

### **H14 Ratcliffe Terrace**

Alix Speed (0043)

No modification specified.

Felix Freund (0530)

No modification specified but suggests removal of H14.

Grange/Prestonfield Community Council (0192)

Expand H14 to include the whole of the area surrounded by Conservation Areas as likely to come forward for redevelopment within plan period, to encourage better place making and integration with adjacent neighbourhoods. And require a place brief.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H14

Margaret Newman (0697)

No modification specified but suggests building should not be higher than existing houses, set back from wall of their property with parking or landscaped garden on the other side of the 4 ft. high wall, and trees planted along the other side of the wall.

SEPA (0012)

No modification specified

### **H15 St Leonard's Street (car park)**

Julie McIlroy (0373)

No modification specified suggests any development should be restricted in height and historical nature of the street needs to be protected. Should be dedicated parking.

Simon Paget-Tomlinson (0375)

No modification specified but suggest removal of H15.

SEPA (0012)

No modification specified

Anne Binckebanck (0372)

Remove proposals and use site for greenspace.

### **H16 Eyre Terrace**

Jennifer Inglis (0437)

Require Place Brief for site.

Add to Appendix D:

- a) Replacement of trees at a level that matches the considerable loss of trees that has already taken place.
- b) Treatment of Fettes Row - the buildings opposite the listed Georgian Terrace on Fettes row should be appropriate in height and massing and architecturally sympathetic.
- c) greater clarity on what 5 m from the trees means
- d) Building height should be restricted on Royal Crescent, or those that are within the setting of Grade A listed buildings on Royal Crescent
- e) Any future development proposal should provide 20% usable greenspace not just open space.
- f) Specify impact on sunlight.
- g) high quality boundary treatments should be preserved.
- h) Materials should be natural sandstone, there should not be glass roof terraces or pavilions, roofs should be natural slate
- i) New outdoor play should be provided

Appendix D should refer to "Dundonald St" not "Drummond Place"

New Town and Broughton Community Council (0254)

No modification specified however representation suggests that Appendix D is inaccurate and should be corrected to reflect planning consent.



Mr Gareth J Roberts (0335)

Remove H16 and allocate for other amenity uses or reduce the number of units.

SEPA (0012)

No modification specified

Wendy Johnson (0002)

No modification specified but suggest removal of H16 and allocation for park extension.

### **H17 Eyre Place**

Alexandra Stevenson (0304), Alasdair Wilson and Gaelle Geveaux, (0807) Daniel Gough (0421), Vanessa Steven (0755), Hannah and Chris Edwards (0696), Lee Davis (0117), Cameron Prentice (0076)

Remove H17.

Angela Ball 0277)

Fully consult and set out plans.

CASL Stanley Place Property Owner Limited (0737)

Amend allocation to accommodate a mix of uses, such as purpose built student accommodation. residential housing and other commercial uses.

Charlie Clark (0790)

No specific modification suggested but infers requirement for the site:

- Access via Rodney Street
- On-site parking
- Adequate drainage

Dr Jane Gear (0487)

No modification specified however representation suggests that the site should not be allocated for housing.

E Roberts (0471)

Limit building height.

Require parking to be contained within site.

Ewan Gray (0103)

Remove and replace with green space proposal.

Francesca Fiori (0390)

Remove H17

Use the land to enhance service provisions the local community

Iain Leslie (0586)

No modification specified but infer removal and allocation for alternative use.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H3.

Irene Kernan (0549)

No specific modification proposed but suggests that the site should be developed for allotments, sheltered facility or health centre.

Lorraine Smith (0462)

No modification specified.

Marton Feigl (0196), Vincent Meiklejohn (0069)

Remove and create park.

Mr Gareth J Roberts (0335)

Remove H17 and allocate for other amenity uses or reduce the number of units.

New Town and Broughton Community Council (0254)

No modification specified however representation implies that the capacity should be reduced and the area should be included in a conservation area.

Sarah Roberts (0630)

Provide detail on building heights.

Restrict building heights

Include new parkland, community centre, skate park or other facility for teen use.

Stephanie Stevenson (0793)

No modification specified.

Theo Scott (0014)

Increase number of units.

William Craigie (0186)

Reduce capacity

SEPA (0012)

No modification specified.

### **H18 Royston Terrace**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H18.

Jonty Bredin (0682)

No modification specified but suggests reviewing proposal.

Michal Rozynek (0626)

No modification specified but suggests current height of buildings should be maintained and access maintained for emergency vehicles.

Melissa Sharkey (0684)

No modification specified.

SEPA (0012)

No modification specified.

Amy Middlemass (0629)

No modification specified.

### **H19 Broughton Road (Powderhall)**

SEPA (0012)

No modification specified.

### **H20 Broughton Market**

Corline Elisabeth Scholes (0713)

Reduce density with the same footprint and height as existing buildings and without substantial changes to windows.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H20

Terry Levinthal (0313)

Delete H20

SEPA (0012)

No modification specified

Edinburgh World Heritage (0339)

Amend first bullet point in Appendix D to:

“The site is located in the Old and New Towns of Edinburgh World Heritage Site and within the immediate setting of a number of listed buildings. The design of the development should seek to fully understand and preserve and/or enhance these heritage assets and their setting.”

### **H21 East London Street**

Amanda Michie (0217)

No modification specified.

Helen Sugden (0797)

Provide details of development.

Italian Consulate General for Scotland and Northern Ireland (0320)

Redefine boundaries of site.

Inverdunning (Hatton Mains) Ltd (0427)

Reduced site in size and amended capacity.

Jennifer Newton (0679)

Reduce density.

Align buildings with the surrounding dwellings.

Provide parking.

SEPA (0012)

No modification specified

Thomas Unter (0204), Nigel Sedgwick (0680)

Reduce capacity.

Require limit on building height.

### **H22 McDonald Road (B)**

Blandfield Residents Association (0426)

Remove H22 and retain for commercial, employment and community use.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H22.

SEPA (0012)

No modification specified.

### **H23 McDonald Place**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H23.

SEPA (0012)

No modification specified.

### **H24 Norton Park**

Annie McIntyre (0802)

No modification specified.

Chris Byrne (0297)

At Appendix D H24 add condition regarding the heights and massing of buildings and frontages. These should not exceed the heights and massing of adjacent tenements on Rossie Place, and any proposed development should not overshadow the sheltered housing to the north of the site.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H24.

### **H25 London Road (B)**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H25.

SEPA (0012)

No modification specified.

### **H26 Portobello Road**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H26.

SEPA (0012)

No modification specified.

### **H27 Willowbrae Road**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Remove H27

SEPA (0012)

No modification specified.

### **H28 Cowan's Close**

Inverdunning (Hatton Mains) Ltd (0427)

Consider that site should be reduced in size with amended capacity as part-owned by the Council and part-owned by a retail unit owner with no confirmation of disposal.

Ruth Buchanan (0083)

No modification specified however infers that parking needs to be addressed.

SEPA (0012)

No modification specified.

## **Summary of responses (including reasons) by planning authority:**

### **General**

New Town and Broughton Community Council (0254)

The proposals map identifies the allocations of the Plan. Outwith these allocations there may be proposals for housing development which have come forward and these are taken account of in the overall housing land supply. Policy Econ 5 requires that proposals to

redevelop employment sites in the urban area should include floorspace designed to provide for a range of business and commercial users. **No modification proposed.**

## **Place 1 – Edinburgh City Centre Policy**

Archie Clark (0003)

The suggestion of inclusion of a car park in George Street is not accepted. The city centre is highly accessible by a range of transport modes and City Plan Policy Inf 3 does not support proposals for new off-street car parking within the city centre. The City Centre Transformation addresses movement in George Street. **No modification proposed.**

Place 1 provides high level principles for the city centre. Provision of pedestrian crossings and integration of tram and bus networks are detailed matters which are more appropriately addressed through the City Centre Transformation (CD060), emerging Princes Street and Waverley Valley Strategy and Place Briefs for Princes Street. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The policy as worded requires that development retains and enhances the character, attractiveness, vitality and accessibility and contributes to its role as a strategic business and regional shopping centre and Edinburgh's role as a capital city. The inclusion of the word minimum is suggested as the representee considers that the policy as worded suggests that only the criteria set out in the policy must be met to make the development acceptable. This is not accepted as the development plan must be read as a whole, other policies will apply, and it is not necessary to state this within the policy. **No modification proposed.**

Paragraph 3.11 requires office provision as part of major mixed-use development, and it encourages housing on appropriate sites. The requirement for office development is not considered to be contrary to the concept of 20 minute neighbourhoods. The city centre contains a range of uses including residential and employment. The city centre is a prime location for office development due to proximity to other office, service and transport hubs. The requirement for office development meets demand in the city centre and ensures an appropriate mix of uses to support economic growth. The city centre performs a number of roles as a capital city and regional centre and place where people live. It is not accepted that the primary requirement in the city centre should be for housing. **No modification proposed.**

Aviva Life and Pensions UK Limited (0598), LaSalle Investment Management (0262), The Institute of Chartered Accountants of Scotland (0182)

Policy Env 26 aims to promote an appropriate density of housing development and recognises at paragraph 3.142 that where appropriate increasing density and building heights can enhance an area's character and lead to better placemaking. Policy Env 30 sets out criteria to be met for development which rises above the building height prevailing generally in the surrounding area. Within the city centre there are a range of heights and specific proposals are best addressed against Policy Env 30, taking account of their precise location and prevailing building heights, through the planning application process. **No modification proposed.**

Cockburn Association (0777)

Paragraph 3.5 makes reference to the World Heritage Site and listed buildings. Paragraph 3.6 sets out the aim of the Plan including to ensure that development in the city centre achieves the right balance between competing priorities including protecting the built and natural heritage. Paragraph 3.11 also refers to the purpose of the policy to ensure development takes account of the characteristics of the historic environment. Further reference to these policy objectives is therefore not necessary. **No modification proposed.**

Cynthia Shuken (0632)

As a capital city and regional centre, it is important that the Plan allows for the city to realise its economic potential. It is recognised that this needs to be balanced with protecting the built and natural heritage. Paragraph 3.6 of the Plan sets this out. Place 1 supports development in the city centre which retains and enhances its character. It guides development to ensure proposals take account of the characteristics of the historic environment. **No modification proposed.**

Edinburgh Chamber of Commerce (0379)

Princes Street is within the identified City Centre Retail Core. Policy Re 2 City Centre Retail Core sets specific policy. Planning guidance, City Centre Shopping and Leisure, January 2020 (CD046), guides development proposals in the city centre retail core. The emerging Princes Street and Waverley Valley Strategy will guide opportunities to enhance the retail and leisure experience on Princes Street. Princes Street is also within the City Centre Transformation programme which aims to make streets more people-friendly and inclusive places that support the local economy. The City Centre Transformation programme is supported by a Delivery Plan (CD060) which sets out how consultation will be undertaken on individual projects. **No modification proposed.**

Edinburgh World Heritage (0339)

Paragraph 3.10 sets out that change in the city centre will be guided by the emerging Princes Street and Waverley Valley Strategy. It provides bullets of some elements that will be guided by the strategy which includes opportunities to enhance the retail and leisure experience on Princes Street. This does not imply that Princes Street is purely shopping and leisure, only that this is one element of the city centre that will be guided by the strategy. Paragraph 3.10 is a summarised reference to the strategy and does not require to set out every aspect that will be guided by it. **No modification proposed.**

Suggested amendments to Place 1 to reflect the importance of the area as a World Heritage Site and the need to protect and enhance this is not considered necessary. Paragraph 3.5 makes reference to the city centre's World Heritage status. Paragraph 1 of Place 1 requires that development retains and enhances the character of the city centre and paragraph 3.11 that proposals should provide a high quality of design taking account of the characteristics of the historic environment. These statements along with Policy Env 9 World Heritage Sites are considered sufficient. **No modification proposed.**

Elgin Haymarket Limited (0292)



The Plan sets out the strategy and policies to be applied to proposals for development across the city. Place policies are provided for major sites, where there are allocations for development within the plan, to guide their development. Place 1 applies across the city centre. The boundary is identified on the proposals map. It includes the area identified in the supporting document submitted with the representation, City Plan 2030: Representation, as the Haymarket District. Place 1 sets out requirements for development within this area. This supports comprehensively designed proposals in accordance with any relevant development brief. Policy Env 2 Co-ordinated Development encourages the preparation of development frameworks, master plans, development briefs or Place Briefs. The principles set out are sufficient to guide development of the Haymarket area, as part of the city centre. **No modification Proposed.**

Hazledene House Limited (0695)

Support for the Princes Street and Waverley Valley Strategy is noted. Paragraph 3.10 sets out key elements of the emerging Princes Street and Waverley Valley Strategy. This includes opportunities to enhance the retail and leisure experience on Princes Street. Suggested inclusions are detailed matters which are more appropriately addressed through the Princes Street and Waverley Valley Strategy and Place Briefs for Princes Street than in the plan. **No modification proposed.**

Living Streets Edinburgh Group (0486)

Paragraph 3.7 sets out that walking, wheeling, cycling and public transport use will be prioritised. There is no need to refer to the transport hierarchy in paragraph 3.8. Paragraph 3.8 sets out actions that will be taken not what the priorities are. Place 3 (h) requires provision of pedestrian/cycle routes through the site. Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. **No modification proposed.**

Place 1 (d) requires the creation of new civic spaces and traffic-free pedestrian routes where achievable. The word achievable is included to acknowledge that this may not always be possible and should be retained. **No modification proposed.**

Melford Developments Ltd (0308)

The policy is considered to provide sufficient flexibility. The policy is worded to provide flexibility using terms – where achievable, where practicable, appropriate to location and maximising the potential of the site. The city centre is a prime location for office development due to proximity to other offices, services and transport hubs and is therefore a preferred location for office development along with strategic business centres, town or local centres and commercial centres as set out in Econ 3. **No modification proposed.**

Map 12 provided on page 43 is illustrative. The boundary of Edinburgh City Centre is shown on the proposals map. **No modification proposed.**

Nuveen Real Estate (0564)

Place 1 (d) requires the creation of new civic spaces. It is not considered to be necessary to include further reference to the benefits of external spaces within supporting text at paragraph 3.11. **No modification proposed.**

#### SEPA (0012)

Paragraph 3.10 sets out that change in the city centre will be guided by the emerging Princes Street and Waverley Valley Strategy. It provides bullets of some elements that will be guided by the strategy. Paragraph 3.10 is a summarised reference to the strategy and does not require to set out every aspect that will be guided by it. **No modification proposed.**

#### Southside Community Council (0781)

Place 1 (d) sets out a policy criterion which requires creation of new civic spaces where achievable. This is considered to be strong enough while being realistic that it may not always be possible to provide. **No modification proposed.**

#### West End Community Council (0692)

The Plan sets out the strategy and policies to be applied to proposals for development across the city. Place policies are provided for major sites, where there are allocations for development within the plan, to guide their development. Place 1 applies to the city centre. The boundary is identified on the proposals map. This area includes a large part of the West End Community Council area. It is not considered appropriate to include a specific Place Policy for the West End. Local Place Plans introduced by the Planning (Scotland) Act 2019 (CD102) will provide an opportunity for communities to set out aspirations for future development of their area. **No modification proposed.**

### **Place 2 – Fountainbridge**

#### Cockburn Association (0777)

Place 2 sets out general principles for development. The layout within buildings is a more detailed matter which is addressed through other policies of the Plan and the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance. **No modification proposed.**

#### Janet Woolley (0470)

Place 2 (c) requires the creation of new public spaces and Policy Env 23 and Env 24 protect open space. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

Place 2 confirms that proposed development must accord with the Fountainbridge Development Principles and the approved, or subsequently approved masterplan. Where active travel proposals are required, they will have to meet the Council's Edinburgh Design Guidance and Street Design Guidance (CD047) which has specific information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the

details will be finalised as part of the Active Travel Action Plan (in preparation). Once this is finalised, this can be reflected in iterations of the City Plan Action Programme. The barrier effect mentioned in criterion (b) relates to the Western Approach Road acting like a barrier to improved active travel connectivity across the city. Reducing the barrier effect will accord with the transport hierarchy as it will prioritise walking, wheeling and cycling. The Council considers the wording of policy Place 2 to be appropriate and it will enable the Council to ensure that no impediment to delivery arises. **No modifications proposed.**

Mark Ockendon (0419)

Building height is controlled by Policy Env 30 (c) which requires that there is no adverse impact on, the historic skyline. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **Place 3 and H8 Astley Ainslie**

#### **General**

Andrew Gray (0388)

The location and scale of housing within the site will be determined through an assessment of the landscape and heritage assets on the site. A Place Brief will establish high level principles to inform future mater planning and design processes. The appropriateness of building on areas not previously occupied will be established through these processes. Policy Env 6 requires that proposals link to the city's green/blue network. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

As set out in Place 3 (b) the location of development is to be determined through an assessment of the landscape and heritage assets on the site. It is therefore not appropriate to include a map at Place 3 until this has been carried out. **No modification proposed.**

Hospital provision is a matter for NHS Lothian. Policy Inf 1 requires access to key community facilities which includes healthcare and schools, therefore if required this would be achieved through Policy Inf 3 and it is not necessary to state this requirement within Place 3. **No modification proposed.**

A definition of a mobility hub is provided in the Plan Glossary at page 201. It is defined as "a local and accessible place which brings together different transport modes alongside associated facilities, services and information to encourage more sustainable travel. Can include a range of shared mobility services, click and collect and electric vehicle charging."

This is considered to provide an example of what a mobility hub might contain. Further details including key elements of mobility hubs and a diagram of components of a mobility hub are set out in the City Mobility Plan 2021-2030 (CD062). This level of detail is not considered necessary within the plan. **No modification proposed.**

Astley Ainslie Community Engagement Group (AACEG) (0275)

Planning Policy is set out in the local development plan. There is no provision for Place Briefs to become planning policy. **No modification proposed.**

Astley Ainslie Community Engagement Group (AACEG) (0275), Maggie Carson (0105)

Appendix D sets out technical requirements for sites and is the appropriate place to set out any requirement rather than within the principles of Place 3. It is suggested that Appendix D should include a requirement for a protected species assessment on this site. Policy Env 21 and Env 37 require proposals to take account of biodiversity considerations, and to achieve this may require a protected species assessment. Therefore, the Council considers no modification is required, however the Reporter may see merit in amending Appendix D for clarity. **No modification proposed.**

The entire site is covered by Tree Preservation Order number 147. Policy Env 20 protects trees and woodlands. Detailed consideration of tree protection measures will be required of any development proposal. It is therefore not necessary to include at Part 4, Table 2, BGN23 that digging of trenches should avoid tree roots. **No modification proposed.**

Frances Guy (0589)

Place 3 provides specific requirements for Astley Ainsley. The other policies of the Plan may also apply to the site depending on the nature of proposals. It would not be practical and would result in duplication if all policies were to be quoted for individual sites. The Plan should be read as a whole, and it is therefore not necessary to repeat these requirements at Place 3. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

It is not appropriate to set out timings for development within the plan. Future Housing Land Audit and Completions programme will set out expected house completions. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. This anticipates a site start in 2027/28. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Astley Ainslie has been identified as a housing site to contribute towards meeting the housing land supply target set out in the plan. It has been identified through a process of site assessment set out in the City Plan Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. In their response to the proposed plan NHS Lothian were supportive of policy that encourages the redevelopment of the Astley Ainslie campus. The Council has carried out consultation on the future redevelopment of the Astley Ainslie site in order to help shape a Place Brief. The Lothian Strategic Development

Framework 2022-2027 (CD130) prepared by the Lothian Health and Care System (a collaboration which includes NHS Lothian) sets out actions to deliver over the next five years. The framework identifies in years 2/3 that proposals for Astley Ainsley will be developed. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. This anticipates a site start in 2027/28. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Jan Hulme (0420)

Place 3 (c) and (d) address history and archaeology. Appendix D identifies that archaeological mitigation will be required. **No modification proposed.**

Place 3 requires that development should accord with a place brief. The Place Brief will establish high level principles to inform future master planning and design processes. Once approved the Place Brief will become non-statutory planning guidance. Proposals for any part of the site in advance of an approved Place Brief will be considered premature in line with Policy Env 2 Co-ordinated Development. **No modification proposed.**

Jane Dudman (0563)

Place 3 sets out high level principles for the site. The detailed design including access will be established through the planning application process. **No modification proposed.**

Janet Woolley (0470)

Support for Place Brief is noted. The site principles set out in Place 3 require a housing-led mixed use development. Policy Hou 2 requires that 35% of the total number of units is affordable housing and Policy Hou 3 requires an appropriate range of type and size of housing. The Plan therefore provides for a mixture of tenure and type. **No modification proposed.**

Kathryn Poolman (0574)

The location and scale of development within the site will be determined through an assessment of the landscape and heritage assets on the site. The entire site is covered by a tree preservation order. Place 3 requires that any development respects the mature landscape setting of the site and retains its special character. Reference is made in paragraph 3.14 to the assessment of proposals against the Astley Ainslie Development Principles and other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity. Policy Env 21 requires that all proposals should safeguard habitat features of biodiversity value and priority species. Policy Env 27 requires that proposals must have a positive effect on biodiversity. Env 25 supports proposals which are designed to create and retain public views of the site as well as through the development and from it. The Plan should be read as a whole, and it is therefore not necessary to repeat these requirements at Place 3. **No modification proposed.**

Maciej Malaszuk (0179)

The site at present contains areas of green space. There are a number of landscape constraints and designations which will necessitate retention of open space within the site. Place 3 also requires that the development should provide open space. A Place Brief will establish high level principles to inform future master planning and design processes. The balance of uses will be determined through this process and subsequent planning applications. **No modification proposed.**

There are existing rights of way recorded through the site which are protected through legislation. In addition, Place 3(h) requires that pedestrian/cycle routes are provided through the site. **No modification proposed.**

The Plan sets out principles, the use of buildings is a matter to be addressed through the development of the place brief, future master planning and design processes and any subsequent planning applications. It would be premature to set out uses at this stage. The principles would allow for community use as part of the housing led development. **No modification proposed.**

NHS Lothian (0596)

The Council carried out consultation in 2019 on the future redevelopment of the Astley Ainslie site. Due to the nature of the site a Landscape and Heritage Assessment is to be provided by NHS Lothian to inform development of a place brief. There is at present no approved Place Brief for the Astley Ainslie site. Paragraph 3.14 states that key stakeholders will be consulted on the development of a place brief. **No modification proposed.**

Patricia Willder (0205)

There are many benefits to higher density development. An education appraisal (CD015) and healthcare appraisal (CD016) have been carried out to assess the impact of the City Plan housing proposals and required infrastructure proposals are set out in part 4, Table 11 and 12. Development is only supported where there is sufficient infrastructure capacity, or it can be delivered at the appropriate time or negative impacts can be mitigated and this is set out in Policy Inf 3 of the plan. Policy Inf 1 requires provision of community infrastructure and Policy Inf 4 requires provision of transport infrastructure. Proposals over 12 units are required to provide affordable housing by Policy Hou 2 and Policy Hou 3 Mixed Communities requires a range of size and type of housing. **No modification proposed.**

Prof D N Bateman (0004)

The level of detail provided in the Plan is considered to be appropriate. The Plan sets out development principles for the site. The detail will be developed from these principles. The location and scale of housing within the site will be determined through an assessment of the landscape and heritage assets on the site. A Place Brief will establish high level principles to inform future master planning and design processes. It would be premature to set out further details at this stage. **No modification proposed.**

The allocation of the site is not considered to contradict the other policies of the plan. 40% of the site is currently allocated open space in the adopted Edinburgh Local Development Plan (CD039), the remainder is built development. The proposal does not imply a loss

open space. The principles require that development of the site should provide open spaces and respect the mature landscape setting and be consistent with the conservation area character appraisal. Policies Env 31 and Env 32 set requirements for open space in new development. **No modification proposed.**

Sally Kerr (0435)

Requirements for health, education and community infrastructure are considered to be sufficiently strong. Place 3 (i) requires provision or contribution towards education, healthcare and community facilities. Policy Inf 1 and Inf 3 set out requirements. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Shelagh Sharp (0111)

Policy Hou 2 Affordable Housing would be applicable to any housing development over 12 units and requires that provision is normally on site. Policy Hou 3 Mixed Communities requires a range of size and type of housing. Place 3 (i) recognises the importance of thorough routes and identifies provision of pedestrian/cycle routes. Place 3 (a) requires provision of new connections and open spaces. **No modification proposed.**

William Mason (0438)

The identification of the site for housing-led development does not prevent the site from being part of a green network. Place 3 requires that the development of the site provides new connections and open spaces. Policy Env 6 requires proposals to protect, enhance and link to the city's green/blue network. In their response to the proposed plan NHS Lothian were supportive of policy that encourages the redevelopment of the Astley Ainslie campus. Lothian Strategic Development Framework 2022-2027 (CD130) prepared by the Lothian Health and Care System (a collaboration which includes NHS Lothian) sets out actions to deliver over the next five years. The framework identifies in years 2/3 that proposals for Astley Ainsley will be developed. It is expected that the site will become available within the period of the plan. **No modification proposed.**

William Moyes (0305)

The Council's Adopted Open Space Strategy (CD066) sets out standards for open space provision. The site meets with the standards set out for access to open space. The strategy also identifies open space proposals. In addition, City Plan has Blue Green Network proposals that are identified in Part 4, Table 1 of the Plan along with proposals required to support development. Policies Env 31 and Env 32 set out requirements for open space in new-build development. All forms of development are required to provide a minimum of 20% of the total site area as open space. Policies and proposals in the Plan should ensure an improvement in open space provision. A review of the Open Space

Strategy and associated Open Space Audit will provide an update regarding access to open space provision and further proposals for enhancement.

The site at present contains significant areas of open space. There are a number of landscape constraints and designations which will necessitate retention of open space within the site. Place 3 also sets a requirement for the provision of open space. A Place Brief will establish high level principles to inform future mater planning and design processes. The balance of uses will be determined through this process and subsequent planning applications. **No modification proposed.**

Place 3 (i) requires provision or contribution towards education, healthcare infrastructure and community facilities. Policy Inf 3 sets out how this ill be provided. An education appraisal (CD015) and healthcare appraisal (CD016) have been carried out to assess the impact of the City Plan housing proposals and required infrastructure proposals are set out in part 4, Table 11 and 12. The site is within the Boroughmuir/James Gillespie's Education Contribution Zone. Table 11 identifies requirements for additional primary, secondary and ELC capacity. While required to contribute to the cost of the infrastructure the location for this provision would not necessarily be on this site therefore there would be no issue in terms of competing with provision of greenspace. **No modification proposed.**

### Capacity

Alison Stoddart (0658), Annie Bell (0136), Archie Clark (0003), Astley Ainslie Community Trust (0318), Jan Hulme (0420), Jennifer Roe (0407), John Falconer (0401), Juniper Green & Baberton Mains Community Council (0306), Olwyn Alexander (0351), Richard Beauchamp (0604), Richard Doake (0436), Ruth Beauchamp (0458), Teresa Fernandes (0194), Tom Proudfoot (0740), William Brotherston (0754)

Capacities of housing proposals are set out in Part 4, Table 2 of the Plan. This identifies a capacity of 500 units for H8 Astley Ainslie. The capacity of the site has been estimated based upon an initial assessment of the site with regard to the landscape and built heritage constraints. As set out in Place 3 (b) the location, scope and scale of development is to be determined through an assessment of the landscape and heritage assets on the site. Capacity will be refined through the development of the Place Brief and any subsequent planning application. **No modification proposed.**

### Neil Ross (0610)

The location and scale of housing within the site will be determined through an assessment of the landscape and heritage assets on the site. A Place Brief will establish high level principles to inform future mater planning and design processes. The appropriateness of restricting building to previously occupied land will be established through these processes. It would be premature to set limitations on location and scale of development at this stage. **No modification proposed.**

### Principles

#### Place 3 (a)



Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jan Hulme (0420), Jennifer Hall (0534), Jennifer Roe (0407), Julia Caroline Higgitt (0067), Michael Adrian Hall (0261), Neil Ross (0610), Olwyn Alexander (0351), Peter Edwards (0601), Richard Beauchamp (0604), Richard Doake (0436), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740), William Brotherston (0754)

It is suggested that priorities are re-ordered however Place 3 (a) does not set priorities. It sets out that there is a requirement for housing led-mixed use development and what it should achieve – respect the landscape setting, create a sustainable place, and provide new connections, open space and other community infrastructure. **No modification proposed.**

Cockburn Association (0777)

The text as worded in the Plan is considered to be appropriate and achieve the same outcome as the suggested replacement of “preserve” with respect. **No modification proposed.**

Colin Fraser (0106), Ian Ross (0423), John Falconer (0401) Maggie Carson (0105), Sergey Gorobets (0414)

The requirement for a housing-led mixed use development set out in place 3 (a) is considered to be appropriate for the site. Astley Ainslie has been identified as a housing site to contribute towards meeting the housing land supply target set out in the plan. It has been identified through a process of site assessment. It provides brownfield sites in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land.

While the requirement is for development to be housing-led a mix of uses should be provided and as set out in Place 3 (b) this is to be developed in the context of the landscape and heritage assets of the site. Principles set out in Place 3 and other relevant plan policies set requirements to preserve greenspace, provide active travel routes and play facilities which should contribute towards health and wellbeing and a green and blue infrastructure proposal is identified in Part 4, Table 1 BGN23. As set out in Place 3 (a) the development should create a sustainable place through the provision of new connections, open spaces and other community infrastructure, not just housing. **No modification proposed.**

### **Place 3 (b)**

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jan Hulme (0420), Jennifer Hall (0534), Jennifer Roe (0407), John Falconer (0401), Julia Caroline Higgitt (0067), Michael Adrian Hall (0261), Olwyn Alexander (0351), Peter Edwards (0601), Richard Beauchamp (0604), Richard Doake (0436), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740)

The location and scale of housing within the site will be determined through an assessment of the landscape and heritage assets on the site. A Place Brief will establish high level principles to inform future mater planning and design processes. The appropriateness of building on areas not previously occupied will be established through these processes. Place 3 (c) requires that the development design is consistent with the

Conservation Area Character Appraisal (CD054) and this includes the setting. Building height is controlled by Policy Env 30 (c) which requires that there is no adverse impact on, the historic skyline, landscape features in the urban area or landscape setting of the city. It would be premature to set limitations on location and scale of development at this stage. The entire site is covered by a tree preservation order. Policy Env 20 presumes against any development that risks damaging impact on any tree and applies to all trees, including those outwith a tree protection order. **No modification proposed.**

Astley Ainslie Community Engagement Group (AACEG) (0275)

The suggested additional text is unnecessary. Place 3(b) as worded sets out that location, scope and scale of development will be determined through an assessment. The whole site is covered by a tree preservation order and this is referred to in Place 3 (b) **No modification proposed.**

Maggie Carson (0105)

Place 3 (c) requires that listed buildings are preserved. Policy Env 3 Development Design also requires that where features worthy of retention, including built structures, are identified and incorporated. The location, scope and scale of any development on this site will be determined through an assessment of the landscape and heritage assets of the site. Policy Env 25 supports proposals which are deigned to create and retain public views of the site as well as through the development and from it. The Plan policies therefore provide appropriate protection. **No modification proposed.**

NatureScot (0528)

Place 3 (b) is considered to sufficiently address the suggested references to assessment of visual context and the need for the tree protection order to inform the location, design and density of development. An assessment of the landscape and heritage assets would include visual context. **No modification proposed.**

Scottish Wildlife Trust Lothian group (0560)

The entire site is covered by a tree protection order. Place 3 (b) refers to this. **No modification proposed.**

**Place 3 (c)**

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jan Hulme (0420) Jennifer Hall (0534), Jennifer Roe (0407), Julia Caroline Higgitt (0067), Olwyn Alexander (0351), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740), Richard Doake (0436)

Policy Env 8 provides policy for sustainable new buildings. In addition to the principles set out at Place 3 the proposals should meet with the other requirements of the plan. The Plan should be read as a whole, and it is therefore not necessary to repeat these requirements at Place 3. **No modification proposed.**

Astley Ainslie Community Engagement Group (AACEG) (0275), Mr Roger Thomas (0345)

Place 3 requires that development design should be consistent with the conservation area character appraisal and Policy Env 3 requires that existing features including built structures are incorporated in development design. This is considered sufficient reference and it is not considered necessary to refer specifically to the preservation of the boundary walls within the principles of Place 3 or BGN23 at Part 4, Table 2. **No modification proposed.**

Fiona Brownlee (0796)

Place 3 (c) requires the preservation/enhancement of listed buildings. In addition, Env 3 requires that existing features, including built structures, worthy of retention on the site are incorporated into the development. The Plan should be read as a whole, and it is therefore not necessary to repeat these requirements at Place 3. **No modification proposed.**

NatureScot (0528)

It is not necessary to amend Place 3 (c) as suggested. Place 3 (b) states that the location, scope and scale of development will be determined through a thorough assessment of the landscape and heritage assets on the site. **No modification proposed.**

### **Place 3 (d)**

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Maggie Carson (0105), Michael Adrian Hall (0261), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Peter Edwards (0601), Richard Beauchamp (0604), Richard Doake (0436), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740), William Brotherston (0754)

Paragraph 3.122 of the Plan set out that developers should seek early advice from the Council's Archaeologist for sites where historic remains are known or thought likely to exist. Appendix D identifies that archaeological mitigation is required. Policy Env 16 and 17 protect archaeological remains and sites. **No modification proposed.**

### **Place 3 (e)**

Dave Berry (0463)

Place 3 (e) requires provision of outdoor play facilities in line with the Council's Open Space Strategy (CD066). The extension of this to include exercise facilities is not considered to be necessary and is not a requirement of the Council's Open Space Strategy. **No modification proposed.**

Sally Kerr (0435)

Place 3 (e) requires that play facilities are integrated into the site layout. This is considered to be sufficient and consideration of the detail of play facilities will be addressed through the development of the Place Brief, future master planning and design processes and any subsequent planning applications. **No modification proposed.**

### **Place 3 (f)**

Annie Bell (0136), Astley Ainslie Community Trust (0318), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Michael Adrian Hall (0261), Teresa Fernandes (0194), Tom Proudfoot (0740), Richard Beauchamp (0604), Ruth Beauchamp (0458), Richard Doake (0436)

The provision of a 15m buffer zone is consistent with Policy Env 29 and reflects what the Council estimates to be appropriate at this juncture for the size. Buffer zones are further addressed at Issue 18 Blue Green Network Proposals BGN23. **No modification proposed.**

Hervé Saint-Amand (0276)

The protection of green space provided in the Plan is considered to be sufficiently explicit. Place 3 development principles require that the development respects the mature landscaping, retains the special character of the site and preserve the setting of buildings. It also states that the location, scope and scale of development will be determined through assessment of the landscape assets. In addition, Policy Env 20 protects trees and woodlands. As set out in Place 3 (b) the entire site is covered by a tree preservation order it is therefore not necessary to include stronger protection for existing woodland area at Place 3 (f). **No modification proposed.**

Mr Roger Thomas (0345)

The Council consider that the use of the term daylighting at Place 3 (f) is sufficiently clear, however, should the Reporter see merit in giving greater clarity then the term de-culverting could replace daylighting. **No modification proposed.**

### **Place 3 (g)**

Maggie Carson (0105)

Policy Env 6 requires proposals to protect, enhance and link to the city's green/blue network. It is not necessary to repeat this at Place 3. Policy Inf 7 sets out the Council's policy on parking. This encourages parking free or low parking developments. It is appropriate that the level of parking is determined through the planning application process on a case by case basis. **No modification proposed.**

Car free development is encouraged and supported in Policy Inf 4. The appropriate level of provision depends on a number of factors. The level of provision is most appropriately determined through the development management process on an individual site basis. **No modification proposed.**

### **Place 3 (h)**

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Engagement Group (AACEG) (0275), Jennifer Hall (0534), Julia Caroline Higgitt (0067), John Falconer (0401), Maggie Carson (0105), Michael Adrian Hall (0261), Peter Edwards (0601), Richard Beauchamp (0604), Richard Doake (0436), Ruth Beauchamp (0458), Sally Kerr (0435), Teresa Fernandes (0194), Tom Proudfoot (0740) William Moyes (0305)

There are existing rights of way recorded through the site. Legislation is in place to protect rights of way and it is not necessary to refer to this within the plan. In addition, Place 3 (h) requires that pedestrian/cycle routes are provided through the site. **No modification proposed.**

### **Place 3 (i)**

Alison Stoddart (0658), Annie Bell (0136), Astley Ainslie Community Trust (0318), Jennifer Hall (0534), Julia Caroline Higgitt (0067), Maggie Carson (0105), Michael Adrian Hall (0261), Richard Doake (0436), Teresa Fernandes (0194), Tom Proudfoot (0740)

Place 3 (i) requires provision or contribution towards education, healthcare infrastructure and community facilities. Policy Inf 3 sets out how this will be provided. An education appraisal (CD015) and healthcare appraisal (CD016) have been carried out to assess the impact of the City Plan housing proposals and required infrastructure proposals are set out in Part 4, Tables 11 and 12 of the Plan. While required to provide or contribute to the cost of the infrastructure the location for this provision would not necessarily be on site. The site is within the Boroughmuir/James Gillespie's Education Contribution Zone. Table 11 identifies requirements for additional primary, secondary and ELC capacity. These do not require a school within the site. Policy Inf 1 requires that key community facilities are walkable within a 20-minute return trip. It is not considered appropriate to state that provision should be on site. **No modification proposed.**

Maggie Carson (0105)

Place 3 (i) requires provision or contribution towards education, healthcare infrastructure and community facilities. Policy Inf 3 sets out how this will be provided. To ensure adequate provision an education appraisal (CD015) and healthcare appraisal (CD016) have been carried out to assess the impact of the City Plan housing proposals and required infrastructure proposals are set out in Part 4, Table 11 and 12 of the Plan. This is considered to be the appropriate means of identifying requirements. **No modification proposed.**

### **Additional Principles**

Astley Ainslie Community Engagement Group (AACEG) (0275)

Reference is made in paragraph 3.14 to the assessment of proposals against the Astley Ainslie Development Principles and other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity. Policy Hou 2 Affordable Housing sets out the requirement for 35% affordable housing. It also requires that provision is normally on site. Policy Env 7 requires that proposals involving construction or change of use of buildings must incorporate all reasonably practicable measures to address the climate emergency and contribute to sustainable living. Policy Env 30 addresses building heights. Policy Inf 1, Inf 3 and Inf 4 set requirements for schools, primary care provision and transport infrastructure. The Plan should be read as a whole, and it is therefore not necessary to repeat these requirements at Place 3. **No modification proposed.**

Living Streets Edinburgh Group (0486)

Car free development is encouraged and supported in Policy Inf 4. The appropriate level of provision depends on a number of factors. The level of provision is most appropriately determined through the development management process on an individual site basis.

**No modification proposed.**

The location scope and scale of development will be established through an assessment of the landscape and heritage assets on the site. Place 3 (h) requires the provision of pedestrian/cycle routes. **No modification proposed.**

Place 3 (i) requires provision or contribution to active travel infrastructure in the vicinity. These are out in Part 4, Table 2 as ATPR7, ATPR8 and ATPR9. They are identified on the proposals map and extend outwith the site and include crossings. **No modification proposed.**

Liz Glass (0645)

Place 3 (a) sets out a requirement for development to respect the landscape setting of the site which has the effect of conserving the special landscape. It is therefore considered that the aim suggested is already included. The entire site is covered by a tree protection order. Reference is made in paragraph 3.14 to the assessment of proposals against the Astley Ainslie Development Principles and other relevant local plan policies. Policy Env 21 requires that all proposals should safeguard habitat features of biodiversity value and priority species. Policy Env 27 requires that proposals must have a positive effect on biodiversity. Policy Env 6 requires proposals to protect, enhance and link to the city's green/blue network. Env 25 supports proposals which are designed to create and retain public views of the site as well as through the development and from it. The Plan should be read as a whole, and it is therefore not necessary to repeat these requirements at Place 3. **No modification proposed.**

It is not accepted that there is a conflict between the allocation of the site and the aims of the Plan to increase green space. 40 % of the site is currently allocated open space in the Edinburgh Local Development Plan, November 2016 (CD039) the remainder is built development. The proposal does not imply a loss open space. The principles require that development of the site should provide open spaces and respect the mature landscape setting and be consistent with the conservation area character appraisal. Policies Env 31 and Env 32 set requirements for open space in new development. The balance of open space and built development will be determined through an assessment of the landscape and heritage assets on the site. The Place Brief will establish high level principles to inform future master planning and design processes. **No modification proposed.**

Mark Ockendon (0419)

Building height is controlled by Policy Env 30 (c) which requires that there is no adverse impact on the historic skyline. **No modification proposed.**

Robert Falcon (0640)

It is not considered necessary to refer to density at Place 3. Capacities of housing proposals are set out in Table 2. This identifies a capacity of 500 units for H8 Astley Ainslie. The capacity of the site has been estimated based upon an initial assessment of the site with regard to the landscape and built heritage constraints. As set out in Place 3

(b) the location, scope and scale of development is to be determined through an assessment of the landscape and heritage assets on the site. Capacity will be refined through the development of the Place Brief and any subsequent planning application. **No modification proposed.**

Scottish Wildlife Trust Lothian group (0560)

It is not considered necessary to refer to reducing the need for cars within the development principles. The allocation of the site is in line with the aim of the Plan to deliver a network of 20-minute walkable neighbourhoods where it is not necessary to have a car to get around. The principles of Place 3 include requirements for active travel routes through and connecting the site to the wider area. **No modification proposed.**

William Brotherston (0754)

The Plan sets out development principles for the site. The detail will be developed from these principles. The scope and scale of housing within the site will be determined through an assessment of the landscape and heritage assets on the site. A Place Brief will establish high level principles to inform future mater planning and design processes. Policy Hou 3 sets requirements for an appropriate range of housing of different types and sizes. It is not necessary to repeat this at Place 3. It would be premature to set out further details at this stage. **No modification proposed.**

William Moyes (0305)

Paragraph 3.118 states that the Council wish to see all development prioritise walking, wheeling and cycling. Place 3 (h) requires provision of pedestrian/cycle routes through the site. Design principles for footpaths and cycle routes are set out in the Council's Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. **No modification proposed.**

The requirement for a high standard of design is set out within Policy Env 14 and Policy Env 7 requires that new buildings should achieve a net zero level of operational greenhouse gas emissions. It is not necessary to state these requirements within the principles of Place 3. **No modification proposed.**

The Plan sets out development principles for the site. The detail will be developed from these principles. The scope and scale of housing within the site will be determined through an assessment of the landscape and heritage assets on the site. A Place Brief will establish high level principles to inform future mater planning and design processes. Policy Hou 3 sets requirements for an appropriate range of housing of different types and sizes. It would be premature to set out further details at this stage. **No modification proposed.**

Place 3 (i) requires the provision of a mobility hub. As set out in the glossary a mobility hub is a local and accessible place which brings together different transport modes alongside associated facilities, services and can include electric vehicle charging. Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement at Place 3. **No modification proposed.**

The Plan set out principles. The detail of landscaping will be considered through the development management process. **No modification proposed.**

A Place Brief will establish high level principles to inform future mater planning and design processes. The principles require an element of open space and the balance of uses will be determined through this process and subsequent planning applications. **No modification proposed.**

### **H1 Dundee Street and H2 Dundee Terrace**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

E Ritchie and D Melrose (0430)

Flooding can be addressed through the development management process. Policy Env 36 requires a Surface Water Management Plan to accompany detailed applications and sets out further criteria including that the design is safe, reliable and effective over the design life of development and long-term maintenance has been considered and agreed. It also requires that where possible existing surface water pipework is replaced by SuDS. In addition, developments should comply with the Council's Surface Water Management Plan guidance (CD077). Policy Inf 22 Water Supply and Foul Waste Water requires an adequate water supply and foul waste water sewerage are available to meet the demand of the developments. Where any enhancement is needed, and it cannot be delivered by the developer directly developer contributions would be sought in line with Policy Inf 3 Infrastructure Delivery and Developer Contributions. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H3 Chalmers Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site is the current location of the Princess Alexandra Eye Pavilion. It has been identified as a housing site to contribute towards meeting the housing land supply target set out in the plan. It was identified in the Edinburgh Local Development Plan Housing Study 2014 which assessed the potential for new residential development within the urban



area. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study. The site was re-assessed through this process. It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. The Lothian Strategic Development Framework 2022-2027 (CD130) prepared by the Lothian Health and Care System (a collaboration which includes NHS Lothian) identifies the redesign & reprovision of the Princess Alexandra Eye Pavilion at the Royal Infirmary campus. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. This anticipates a site start in 2029/30. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H4 Dalry Road**

##### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

##### Dalry Local Residents (0267)

H4 Dalry Road is identified at Part 4, Table 2. This states that development should accord with the Development Principles set out in Appendix D. Appendix D requires that the layout and building design need to positively address the boundary to Dalry Community Park and overlook the park; links to the pedestrian and cycle path network to the south and west need to be provided; and an active frontage is to be provided to Dalry Road. The Plan sets out general principles for the development. Detailed matters of design would be dealt with through the planning application process. The suggested extension of the site extends into the adjacent supermarket site. Should this adjacent site come forward for development proposed plan Policy Hou 1 would support the principle of housing development. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with

the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H5 Roseburn Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Murrayfield Community Council (0146)

Development is required to contribute towards an upgrade of play facilities in Roseburn Public Park to excellent standard to ensure that the site meets the Play Access Standard set out in the Council's Open Space Strategy (CD066) and are adequately served by a suitable standard of play facilities space within walking distance. This is necessary in this instance as these sites are not within such a walking distance at present and there is insufficient space on this site or the adjacent H6 site to provide a suitable quality play space. **No modification proposed.**

SEPA (0012)

Appendix D sets out technical requirements for housing proposals. This does not require a flood risk assessment for this site. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. It is therefore considered that the policies in the Plan are sufficient to address any flooding risk. However, if the Reporter sees merit in providing additional clarity then that requirement could be added to the text. **No modification proposed.**

### **H6 Russell Road (Royal Mail)**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### Murrayfield Community Council (0146)

Development is required to contribute towards an upgrade of play facilities in Roseburn Public Park to excellent standard to ensure that the site meets the Play Access Standard as set out in the Council's Open Space Strategy (CD066) and are adequately served by a suitable standard of play facilities space within walking distance. This is necessary in this instance as these sites are not within such a walking distance at present and there is insufficient space on this site or the adjacent H5 site to provide a suitable quality play space. **No modification proposed.**

#### Royal Mail Group Limited (0501)

Whilst the Royal Mail Group may need their existing sites for current business requirements, those requirements may change over the life-time of the plan. By identifying this site for potential redevelopment for housing led mixed use development the Plan is showing its support for future redevelopment of this site, in line with the principles set out in Appendix D. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. This anticipates a site start in 2032. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. The Agent of Change principle puts the onus on developers of new, noise-sensitive properties to effectively deal with potentially problematic noise. **No modification proposed.**

#### SEPA (0012)

Appendix D sets out technical requirements for housing proposals. This does not require a flood risk assessment for this site. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. It is therefore considered that the policies in the Plan are sufficient to address any flooding risk. However, if the Reporter sees merit in providing additional clarity, then that requirement could be added to the text. **No modification proposed.**

#### **H7 Murieston Lane**

#### Inverdunning (Hatton Mains) Ltd (0427), Nick Johnstone (0368), Simon Thomson (0248)

The site was identified through the Edinburgh Local Development Plan Housing Land Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The study identified a potential capacity of 107 dwellings per hectare using the methodology set out in the 2014 Housing Study. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study. The site was re-assessed through this process. The capacity has been recalculated using the updated capacity methodology set out in the Choices Housing Study 2020. A medium-high level of density was applied in line with the methodology set out in the Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. Whilst the current owner may have no intentions of disposing

of the site this may change over the life-time of the plan. By identifying this site for redevelopment for housing-led mixed use development the Plan is showing its support for future redevelopment of this site, in line with the development principles set out in Appendix D, should it become available.

Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H9 Falcon Road West**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020. It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H10 Watertoun Road**

Andrew and Alison Ferguson (0429), Dr Y Wang (0522), Grange/Prestonfield Community Council (0192)

The site has been subject to a planning application 21/03813/FUL. On 6 September 2022 a notice of intention was issued on behalf of Scottish Ministers to allow an appeal DPEA ref PPA-230-2375 (CD174) for the development of 49 units. The site should be retained in the Plan to allow for the circumstance should the decision not be issued, or the planning consent not implemented. Issues of amenity, transport, flooding, trees and education

infrastructure have been considered through the planning application process. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H11 Watson Crescent Lane**

##### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H12 Temple Park Crescent**

##### Yinshuang ding (0086)

The Plan does not specify a height for proposed development. Appendix D sets out principles for the site which include that new development should reflect the roofscape articulation of the tenements along Temple Park Crescent. This also notes that the site is within the viewcones of several Protected City Views and that excessive overshadowing of the canal should be avoided. Policy Env 30 Building Heights only supports development which rises above the prevailing building height in certain circumstances. The layout and design of development will be considered through the detailed planning application process against this, and other relevant policies of the plan. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with

the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H13 Gillespie Crescent**

Brenda Rowan (0488), Gabriela Medero (0022), George Goussetis (0269), Louise Blanke (0675), Luke Treadwell (0748), Nick Sherington (0500), Sandy Ramsay (0026), Steve Garrett (0359), Tollcross Community Council (0332), Inverdunning (Hatton Mains) Ltd (0427), Shona Simon (0242)

The site is currently in the ownership of Viewpoint Housing Association. It was identified through the Edinburgh Local Development Plan Housing Land Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The study identified a potential capacity of 100 dwellings per hectare using the methodology set out in the 2014 Housing Study. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study. The site was re-assessed through this process. It continues to be included due to the potential to increase the density of development on the site. The capacity has been recalculated using the updated capacity methodology set out in the Choices Housing Study 2020. A medium-high level of density was applied in line with the methodology set out in the Housing Study (CD026). This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. Appendix D sets out principles for the site. This includes that the design of the development should seek to fully understand and preserve and enhance the setting of the listed building and should be subservient to the opposite tenements and sympathetic to the adjacent single storey Royal Blind School with which an improved relationship should be investigated. Along with other policies of the Plan these are considered to address the issues of concern related to traffic, scale, amenity, character of area, community facilities, drainage and open space. While the site is not currently being proposed for development by its owner the site offers an opportunity for increased density and an appropriate location for housing. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H14 Ratcliffe Terrace**

Alix Speed (0043)

In the current local development plan the site forms part of the urban area where the LDP and proposed plan support housing development. Identification of the site for housing in

the proposed plan sets the principle of the development of this site for housing before any other use. Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes either place policies or development principles for all allocated sites. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process. Matters related to access during construction are not within the scope of the plan. **No modification proposed.**

Felix Freund (0530)

The site was identified through the Edinburgh Local Development Plan Housing Land Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study and also included a new assessment of urban brownfield land. The site was re-assessed through this process. It was assessed against active travel, public transport, community infrastructure and flooding. At the time of assessment, the site did not meet the criteria for community infrastructure due to school capacity. An education appraisal (CD015) has been carried out for the proposed plan which identifies requirements for education infrastructure as a result of the proposed plan sites including H14. The site is not in a Conservation Area however it is adjacent to the boundary of the Grange Conservation Area and there are a number of listed buildings adjacent to the site. It is considered that the policies in the Plan address these matters sufficiently. In addition, Appendix D sets out that the design of the development should seek to fully understand and preserve and/or enhance the setting of the listed buildings. It also acknowledges that the site is within the viewcones of several Protected City Views which is addressed by Policy Env 30 Building Heights. Appendix D also addresses this requiring that the design and building heights should respect the adjacent villas and be subservient to the tenements.

Policy Env 33 addresses amenity issues. The site does not fall within a designated local centre. It is however within a short walk of Ratcliffe Terrace Local Centre which provides a range of services. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

H14 is a housing proposal which is supported for housing development by Policy Hou 1. It would not be appropriate to expand the allocation to a much wider area. It was identified through the Edinburgh Local Development Plan Housing Land Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The Choices Housing Study, January 2020 carried forward undeveloped sites from the 2014 Housing Study and also included a new assessment of urban brownfield land. This did not identify further sites in the immediate vicinity. Environment and design policies of the Plan provide appropriate policy context for consideration of placemaking and integration with the surrounding area. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020. It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional

programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Margaret Newman (0697)

Appendix D sets out principles for development of the site including that the design and building heights should respect the adjacent villas and be subservient to the tenements. Along with Policy Env 30 and other relevant policies of the Plan this is considered sufficient. The design and layout of the development along with amenity are matters to be considered through the planning application process. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H15 St Leonard's Street (car park)**

Anne Binckebanck (0372), Simon Paget-Tomlinson (0375)

The Plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified through the Choices Housing Study, January 2020 (CD026) which provides an assessment of urban brownfield land to identify land with potential for housing development and estimate the housing capacity that could be delivered on that land. It was assessed against active travel, public transport, community infrastructure and flooding and considered to be suitable for development. The Council's Adopted Open Space Strategy (CD066) sets out standards for open space provision. The site meets with the standards set out for access to open space. The strategy also identifies open space proposals. In addition, City Plan has Blue Green Network proposals that are identified in Part 4, Table 1 of the Plan along with proposals required to support development. Policies Env 31 and Env 32 set out requirements for open space in new-build development. All forms of development are required to provide a minimum of 20% of the total site area as open space. Policies and proposals in the Plan should ensure an improvement in open space provision. A review of the Open Space Strategy and associated Open Space Audit will provide an update regarding access to open space provision and further proposals for enhancement.

The Plan sets out policies to ensure that any infrastructure required to support the development is provided. An education appraisal (CD015) has been carried out for the proposed plan which identifies requirements for education infrastructure as a result of the proposed plan sites including H15 and addresses any capacity issue. Policies are also set out to protect trees and features worthy of retention. In addition, development principles set out in Appendix D require that the design of the development should seek to fully understand and preserve and/or enhance the setting of listed buildings and that non-



designated heritage assets on the site (stone walls to the former railway yard) should be considered when developing proposals.

Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes either place policies or development principles for all allocated sites. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process. Parking policies are set out in the plan. It is considered that policies in the Plan address the matters raised sufficiently. **No modification proposed.**

Julie McIlroy (0373)

In addition, development principles set out in Appendix D require that the design of the development should seek to fully understand and preserve and/or enhance the setting of listed buildings and that non-designated heritage assets on the site (stone walls to the former railway yard) should be considered when developing proposals. Policy Env 30 provides policy on building heights. Parking policies are set out in the plan. It is considered that policies in the Plan address the matters raised sufficiently. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

## **H16 Eyre Terrace**

Jennifer Inglis (0437), Mr Gareth J Roberts (0335), Wendy Johnson (0002)

The site was identified in the Edinburgh Local Development Plan Housing Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study. The site was re-assessed through this process. It was assessed against active travel, public transport, community infrastructure and flooding. At the time of assessment, the site did not meet the criteria for community infrastructure due to school capacity. An education appraisal (CD015) has been carried out for the proposed plan which identifies requirements for education infrastructure as a result of the proposed plan sites including H16 which addresses this deficiency. It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land.

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). A medium-high level of density was applied. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%.

Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes either place policies or development principles for all allocated sites. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process.

Planning consent 20/03034/FUL (CD172) was issued in September 2021 for a mixed use development including 349 dwellings. It is considered appropriate to retain the allocation within City Plan until such time as construction begins. This would allow for any change in circumstances such as responding to changes in the market.

Policies are contained within the Plan which address the issues suggested for inclusion in Appendix D. It is not the purpose of the Appendix to set out all the policies which may apply to proposals. The Plan should be read as a whole.

The Council's Open Space Strategy (CD066) sets out open space standards measured in terms of distance and quality. The large greenspace standard states that all homes should be within 800m walking distance of an accessible large greenspace of at least two hectares and of 'good' quality. The Open Space Strategy states that King George V Park contributes to the large greenspace standard, falling only slightly below the two hectare threshold at 1.97 ha. It was last audited as being of 'good' quality. The Open Space Strategy and associated action plans show the areas that are meeting/not meeting the large open space standard. These indicate that the homes within the vicinity of the site are meeting the standard for large greenspace. Likewise, the play standard shows similar results.

Requirement for place briefs is set out in the Plan for sites which cover a wider area, however where this is not specified policy Env 2 (b) provides for circumstances in which the Council considers a Place Brief is required as part of a planning application submission.

The Council acknowledge that Appendix D incorrectly refers to views down Drummond Place rather than Dundonald Street. This should be corrected as a technical amendment to the Plan. **No modification proposed.**

#### New Town and Broughton Community Council (0254)

Appendix D and Part 4, Table 2 sets out a capacity of 245. The capacity has been calculated using the. It is appropriate to retain the allocation with the capacity identified in methodology set out in the Choices Housing Study 2020 (CD026). Planning consent 20/03034/FUL (CD172) was issued in September 2021 for a mixed use development including 349 dwellings the Plan until such time as construction begins. Should the current consent not be implemented the actual capacity of any future proposal will be determined through the design and planning application process. Policy Econ 5 requires that proposals to redevelop employment sites in the urban area should include floorspace designed to provide for a range of business and commercial users. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H17 Eyre Place**

Alexandra Stevenson (0304), Alasdair Wilson and Gaelle Geveaux (0807), Charlie Clark (0790), Cameron Prentice (0076), Daniel Gough (0421), Dr Jane Gear (0487), Roberts (0471), Ewan Gray (0103), Francesca Fiori (0390), Hannah and Chris Edwards (0696), Iain Leslie (0586), Irene Kernan (0549), Lee Davis (0117), Lorraine Smith (0462), Marton Feigl (0196), Mr Gareth J Roberts (0335), Sarah Roberts (0630) Stephanie Stevenson (0793) ) Vanessa Steven (0755), Vincent Meiklejohn (0069), William Craigie (0186)

The Plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The study identified a potential capacity of 124 dwellings per hectare using the methodology set out in the 2014 Housing Study. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study. The site was re-assessed through this process. It was assessed against active travel, public transport, community infrastructure and flooding. At the time of assessment, the site did not meet the criteria for community infrastructure due to school capacity. An education appraisal (CD015) has been carried out for the proposed plan which identifies requirements for education infrastructure as a result of the proposed plan sites including H17 which addresses this deficiency. The capacity has been recalculated using the updated capacity methodology set out in the Choices Housing Study 2020 (CD026). A medium-high level of density was applied in line with the methodology set out in the Choices 2020 Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land.

The Council's Open Space Strategy 2021 (CD066) sets out standards for open space provision. The site meets with the standards set out for access to greenspace. The strategy also identifies open space proposals. These are identified in Part 4, Table 1 of the Plan along with proposals required to support development. Policies Env 31 and Env 32 set out requirements for open space in all new-build development. Housing development is required to provide a minimum of 20% of the total site area as open space. Policies and proposals in the Plan should ensure an improvement in open space provision. A review of the Open Space Strategy will set out detail on open space provision and will advance proposals for its enhancement.

The Plan sets out policies to ensure that any infrastructure required to support the development is provided. An education appraisal (CD015) has been carried out for the proposed plan which identifies requirements for education infrastructure as a result of the proposed plan sites including H17 and addresses any capacity issue. A healthcare appraisal identifies requires for primary care provision.

In addition, development principles set out in Appendix D require that the character of Eyre Place Lane is to be retained, including the setted street and high quality boundary treatments, development to the north of the site should reflect the height and massing of the adjacent tenements along Eyre Place, that the height and scale of buildings should step down to the south of the site to reflect the existing mews buildings along Eyre Place Lane, that a link to the pedestrian and cycle routes along Rodney Street should to be provided along with a link into the King George V park if possible.

Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes either place policies or development principles for all allocated sites. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process. Parking policies and requirements for drainage are set out in the plan. It is considered that policies and development principles in the Plan address the matters raised sufficiently. **No modification proposed.**

Angela Ball (0277)

The Plan sets out policies to ensure that any infrastructure required to support the development is provided. An education appraisal (CD015) has been carried out for the proposed plan which identifies requirements for education infrastructure as a result of the proposed plan sites, including H17, and addresses any capacity issue. A healthcare appraisal identifies requires for primary care provision.

It is not accepted that the area lacks green space. The Council's Adopted Open Space Strategy 2021 (CD066) sets out standards for open space provision. The site meets with the standards set out for access to open space. The strategy also identifies open space proposals. In addition, City Plan has Blue Green Network proposals that are identified in Part 4, Table 1 of the Plan along with proposals required to support development. Policies Env 31 and Env 32 set out requirements for open space in new-build development. All forms of development are required to provide a minimum of 20% of the total site area as open space. Policies and proposals in the Plan should ensure an improvement in open space provision. A review of the Open Space Strategy and associated Open Space Audit will provide an update regarding access to open space provision and further proposals for enhancement. The site is close to King George V Park and development principles set out at Appendix D requires that a link into King George V Park should be investigated and provided if possible.

The Plan sets out general principles for the development. The proposed plan has been consulted upon as set out in the Report of Conformity (CD021). Detailed matters of design would be dealt with through the planning application process which provide for consultation. Structural impacts are not matters to be addressed in the plan. **No modification proposed.**

CASL Stanley Place Property Owner Limited (0737)

The Plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Choices Housing Study, January 2020 (CD026) which assessed the potential for new residential development within the urban area. It provides

a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the Plan it is appropriate that this site is allocated for housing. Policy Hou 6 supports student accommodation in appropriate locations and economy policies provide support for other commercial uses. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Theo Scott (0014), William Craigie (0186), Mr Gareth J Roberts (0335), New Town and Broughton Community Council (0254)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). The capacities of sites in general is covered in Issue 20: Assessment of Housing Land Supply. A medium-high level of density was applied to the site in line with the methodology set out in the Choices 2020 Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. The actual capacity will be determined through the design process and planning application process. **No modification proposed.**

New Town and Broughton Community Council (0254)

The Council has a statutory duty to review and designate conservation areas. Conservation Areas in the city are regularly reviewed through review of Conservation Area Character Appraisals. Any changes to boundaries would be made through this process. Policy Env 3 addresses existing characteristics and features worthy of retention on site and in the surrounding area and along with other policies of the Plan would be used to assess development proposals. **No modification proposed.**

**H18 Royston Terrace**

Amy Middlemass (0629), Jonty Bredin (0682), Michal Rozynek (0626), Melissa Sharkey (0684)

The site was identified in the Edinburgh Local Development Plan Housing Study 2014 (CD044) which assessed the potential for new residential development within the urban area. The Choices Housing Study, January 2020 (CD026) carried forward undeveloped sites from the 2014 Housing Study. The site was re-assessed through this process. It was assessed against active travel, public transport, community infrastructure and flooding. At the time of assessment, the site did not meet the criteria for active travel. Appendix D identifies an opportunity to provide footpath connection through the site between Royston Terrace and Goldenacre Terrace.

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). A high level of density was applied in line with the methodology set out in the Choices 2020 Housing Study. The height of building is set out in development principles for the site at Appendix D which requires that the building line along Royston Terrace should align with the east elevation of Monmouth Terrace, and the height and massing of new development should reflect that of the existing adjacent tenements along Royston Terrace and Goldenacre Terrace.

Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes either place policies or development principles for all allocated sites. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process. The appropriate level of parking provision will be established through the planning application which would assess the proposal against Policy Inf 3 Private Car Parking. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H19 Broughton Road (Powderhall)**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land

rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H20 Broughton Market**

#### Corline Elisabeth Scholes (0713)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). A medium high level of density was applied in line with the methodology set out in the Choices 2020 Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. The actual capacity will be determined through the design process and planning application process.

Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes either place policies or development principles for all allocated sites. Policies are provided within the Plan which address these detailed matters which, along with the Council's Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Terry Levinthal (0313)

The allocation of the site does not presume demolition. There are no listed buildings on the site. Proposals for demolition would be considered against Policy Env 13 Conservation Areas – Demolition of Buildings and Env 7 Sustainable Buildings which requires a comparative carbon assessment. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council considers the wording of the bullet points for H20 in Appendix D to be sufficiently robust whilst still providing the decision maker a degree of flexibility when assessing a planning application. Policy Env 9 (World Heritage Sites) would be applicable in the assessment of any application that could harm the qualities of World Heritage Sites. Policy Env 11 (Listed Buildings-Setting) would also be applicable. The Council's position relative to the historic environment is covered in detail in Issue 14 Historic Environment Policies. **No modification proposed.**

**H21 East London Street**

Amanda Michie (0217), Helen Sugden (0797), Jennifer Newton (0679), Nigel Sedgwick (0680), Thomas Unter (0204)

The level of detail provided in the Plan is considered to be sufficient. Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design. City Plan includes development principles for the site at Appendix D. Policies are provided within the Plan which address detailed matters which, along with the Edinburgh Design Guidance (CD047) and other non-statutory guidance, will be used to assess proposals through the planning application process.

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). A medium high level of density was applied in line with the methodology set out in the Choices 2020 Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. The actual capacity will be determined through the design and planning application process. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. It is not



agreed that the site size should be reduced in the basis of land ownership. **No modification proposed.**

Italian Consulate General for Scotland and Northern Ireland (0320)

The Republic of Italy owns the adjacent site. H21 is not within that ownership. The Plan establishes the principle of housing development on the site. Layout of the site in relation to its surroundings would be considered at planning application stage when detailed matters would be taken into account. Property rights are a private legal matter for the developer and holder of those rights. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H22 McDonald Road (B)**

Blandfield Residents Association (0426)

The site was identified in the Choices Housing Study, January 2020 (CD026). It was assessed against a number of criteria and considered to be suitable for development in terms of walking distance to local convenience services and employment clusters and access to the wider cycle network. It was considered only partially suitable for development based upon public transport accessibility. The site has a PTAL score of 2. While the PTAL score is at the lower end of the scale for public transport accessibility the site is within walking distance of Leith Walk which is well served by public transport and in future will be served by the tram. The site also scored low in terms of education and as a result community infrastructure. An Education Appraisal (CD015) has been carried out for all proposed plan sites, including H22. Actions are identified to provide the capacity to support development and set out in Part 4, Table 2.

The Council's Adopted Open Space Strategy (CD066) sets out standards for open space provision. The site meets with the standards set out for access to open space. The strategy also identifies open space proposals. In addition, City Plan has Blue Green Network proposals that are identified in Part 4, Table 1 of the Plan along with proposals required to support development. Policies Env 31 and Env 32 set out requirements for open space in new-build development. All forms of development are required to provide a minimum of 20% of the total site area as open space. Policies and proposals in the Plan should ensure an improvement in open space provision. A review of the Open Space Strategy and associated Open Space Audit will provide an update regarding access to open space provision and further proposals for enhancement.

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). A medium high level of density was applied in line with the methodology set out in the Choices 2020 Housing Study. The actual capacity will be determined through the design process, which would consider massing, and the planning application process.

The Powderhall Railway line is identified as an active travel safeguard in the plan. Policy Inf 10 requires that development proposals design for and deliver direct connections to adjacent segregated active travel infrastructure. Policy Inf 7 addressed car parking.

While there may be existing businesses operating this is not seen as a barrier to development. Issue 3 Delivery of the Strategy deals with re-provision of business space. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H23 McDonald Place**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H24 Norton Park**

Annie McIntyre (0802)

A Strategic Environmental Impact Assessment has been carried out and is reported in the City Plan Environmental Report (CD010). A site assessment is provided at Appendix 4. The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). A medium high level of density was applied in line with the methodology set out in the Choices 2020 Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. The actual capacity will be determined through the design process and planning application process.

Policies within the Plan address the issues raised. Policy Env 37 ensures positive effect on biodiversity and infrastructure policies require that the infrastructure is available or will be made available to serve development. Policy Env 4 Development Design addresses height, scale and materials and detailing. Policies Env 33 addresses amenity and Policy Env 34 addresses pollution. The Plan establishes the principle of housing on the site and the detail will be established through the planning application process. **No modification proposed.**

Chris Byrne (0297)

It is not considered necessary to add a condition regarding heights and massing. Policy Env 30 Building sets policy to be applied. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H25 London Road (B)**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional

programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H26 Portobello Road**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H27 Willowbrae Road**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The site was identified in the Choices Housing Study, January 2020 (CD026). It provides a brownfield site in line with the aim of the Plan to maximise the use of brownfield land rather than greenfield land. Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

## **H28 Cowan's Close**

### Inverdunning (Hatton Mains) Ltd (0427)

It is not agreed that the capacity or size of the site requires to be altered. A Planning Application (21/06745/FUL) (CD173) for an affordable housing development of 19 units, on part of H18, in Council ownership was approved by the Council's Development Management Sub-Committee on 17 August 2022. In relation to the remaining site the Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. **No modification proposed.**

### Ruth Buchanan (0083)

Car free development is encouraged and supported in Policy Inf 4. The appropriate level of provision depends on a number of factors. The level of provision is most appropriately determined through the development management process on an individual site basis. **No modification proposed.**

### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **Reporter's conclusions:**

### **Reporter's recommendations:**

<b>Issue 5</b>	<b>Proposed Sites North and East</b>	
<b>Development plan reference:</b>	Part 3, pages 46-70 and Part 4 Table 2 pages 158-161	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <div> Action Porty (0250)  Alasdair Grant (0089)  Alastair Cameron (0145)  Ali Hall (0072)  Alison Winkler (0041)  Ambassador Group (0683)  Andrew Brown (0007)  Andrew John Parnell and Brigitta Marianne Sjoberg Parnell (0344)  Anna Brand (0742)  Anne Meikle (0286)  Anne Thomson (0551)  Antonio Alonzi (0270)  APS Group (Scotland) Ltd (0518)  Arnold Clark Automobiles Ltd (0750)  Asda Stores Limited (0142)  Beverley Burgess (0605)  Biffa (0804)  Bridget Campbell (0706)  Callum Melville (0155)  Catherine Ness (0642)  Celia Mainland (0447)  Christine Nurse (0323)  Christopher Fraser (0371)  Cockburn Association (0777)  Community Council (0776)  Corrie Fairweather-Mills (0527)  Craig McIntyre (0709)  Craighleith/Blackhall Community Council (0403)  Crosslane Co-Living SPV 2 Limited (0687)  Dave Berry (0463)  David Brownlee (0120)  David Cooper (0735)  David Thomson (0538)  David Williams (0643)  Deidre Brock MP (0801)  Diana Cairns (0452)  Dr Liam Keegan (0389)  Edinburgh Dog and Cat Home (0310)  Elizabeth M Kungu (0063) </div> <div> John Gerard Holligan (0412)  Julie Robertson (0210)  Katie Soane (0260)  Katrina Danson (0301)  Kenneth MacLean (0046)  Kim McFarlane (0698)  Lawrence Marshall (0702)  Legal &amp; General Property Partners (Industrial Fund) Limited and Legal &amp; General Property Partners (Industrial) Nominees Limited (0736)  Leith Central Community Council (0614)  Leith Harbour and Newhaven  Leith Links Community Council (0617)  Lesley Moyes (0703)  Liane Montgomery (0030)  Living Streets Edinburgh Group (0486)  LPBZ Commercial Ltd (0391)  Manse (Seafield) LLP (0212)  Mark Ockendon (0419)  Mary Burgess (0456)  Matthew Gason (0090)  Morgan Smith (0788)  Nadia McIntyre (0704)  Naomi Appleton (0271)  National Galleries of Scotland (0725)  NatureScot (0528)  Network Rail (0071)  Newbarns Brewery (0653)  NHS Lothian (0596)  Oonagh O'Brien (0585)  Paul Gibson (0559)  Peter Allen (0336)  Police Scotland / Scottish Police Authority (0659)  Portobello Amenity Society (0612)  Portobello Community Council (0206)  Rachel Ross (0784)  Ramsay Cornish Auctioneers Ltd. (0685)  Richard Cherns (0476)  Royal Mail Group (0501) </div> </div>		

Elizabeth Morton (0772) Emma Whitfield (0031) Finance Development LLP (0688) Forth District Salmon Fishery Board - Crown Estate Scotland (0346) Forth Ports Limited (0496) Framework (Edinburgh) Limited (0743) Gareth Hutchinson (0290) Gemma Sethsmith (0694) Gillian Rae (0571) HCPII Properties 101LP (0517) Helen MacLeod (0364) Helen Mitchell (0484) Henry Sandercock (0044) Hew Dalrymple (0238) Hilary Hines (0265) Howard Jones (0424) Ian McRae (0028) Ian R N Stewart (0131) Inverdunning (Hatton Mains) Ltd (0427) Isabel Steel (0245) J. Smart & Co. (Contractors) PLC (0483) Jacqueline Christie (0023) Jayne Thurlow (0037) Jennifer Elliot (0791) Jennifer Reaves (0299) Jodi Duffin (0264)	RSPB (0648) Sapphire Land (0247) Sarah Farrell (0473) Sarah Roberts (0630) Scottish Water (0342) SEPA (0012) Serge Marti (0745) Sheila Strathdee (0448) Sheila Young (0251) Shortbread House of Edinburgh Ltd (0619) Simon Thomson (0248) Stephen Ian Hawking (0469) Susan Burney (0360) Susanna Sharp (0638) Susie Ross (0440) Suzanne Bruce (0565) Suzanne McIntosh (0409) Synergy Group Fitness (0806) The Royal London Mutual Insurance Society Ltd (0149) The Salvation Army (0189) Union Property Services Ltd/VRS Ltd (0584) Ursula Wright (0662) Victoria Hart (0191) Water of Leith Conservation Trust (0392)
<b>Provision of the development plan to which the issue relates:</b>	Place Policies 4-15, Housing Proposals; Table 2 Housing Proposals (North Edinburgh); Table 2 Housing Proposals (East Edinburgh); City Plan Appendix D
<b>Planning authority's summary of the representation(s):</b>	
<p><b>Various North and East Proposed Sites</b></p> <p><u>Suzanne Bruce (0565)</u></p> <p>The plan acknowledges that the areas allocated for housing will result in a population exceeding the capacity of current general practices in the north part of Edinburgh's North East Locality. This is in addition to the thousands of other properties that have already been built. Wrong to deliberately over-develop an area when the negative social and environmental impacts are well known. For those living in these rapidly expanding areas, the effects of the massive increase in developments and the resulting residents/tourists/students is enormous. The reduced environmental quality is significant and traffic and pollution levels have increased enormously. Green space being removed from public use has meant the negative effects of over development are already felt and there appears to be a lack of understanding or unwillingness to gather data and analyse it. Over exceeding population capacity it is contrary to Scottish government aims.</p> <p><u>Howard Jones (0424)</u></p>	

Resulting population density would impact negatively on existing residents and users of this area across all areas including public transport, active travel, drainage (flood areas already in existence), education and private motor traffic.

#### **Place Policy 4 - Edinburgh Waterfront**

##### SEPA (0012)

Flood risk is mentioned as something to inform design and layout. We consider there is potential to provide more detail. (Please see our comments elsewhere on Docks area, e.g. H35 & H55).

Some sites require a flood risk appraisal and some a flood risk assessment. Advise the use of common terminology throughout to be clear that what is required is a flood risk assessment.

##### RSPB (0648)

The Waterfront 'Major New Development area' shown in Map 1 is adjacent to the Firth of Forth SPA and the Imperial Dock Lock SPA, and proposed developments in this area are likely to require to undergo a Habitats Regulation Assessment to ensure there are no adverse effects on the integrity of these protected sites.

Do not support text in section 3.23. It mentions that the site is supported by a Granton Waterfront Development Framework and Appropriate Assessment. The Appropriate Assessment identified disturbance, and collision risk/barriers to movement, as potential impacts on the qualifying interest of the Firth of Forth SPA. The mitigation measures described in section 3.24 are focused on minimising disturbance during construction, but other than the lighting strategy, there is no mention of means to reduce operational disturbance. A former industrial area changed to residential developments is likely to bring much more human (and canine) visits to the shore in winter which could lead to higher levels of disturbance than currently seen. The Appropriate Assessment must assess cumulative and in-combination effects - Measures such as the screening of sensitive areas of the shoreline to reduce disturbance by dog walker and providing signage discouraging disturbance of designated species while the feed at low tide may go some way to mitigating this issue but any development must be assessed in detail on a case by case basis.

##### LPBZ Commercial Ltd (0391)

"Mixed use regeneration" description for the waterfront is misleading - It is basically a large housing allocation.

A long-term issue for Edinburgh is that it has been unable to meet its housing demand in full. LPBZ have a concern that by focussing housing on "brownfield only" sites within the city boundary is to the detriment of maintaining and providing new sites for office development.

Office supply in Edinburgh city centre has been on a downward trend since 2009 and is now at an all-time low mainly due to the lack of new purpose-built offices being developed. Not all organisations require a central location and supply restrictions may see a movement of these occupiers to more peripheral and locations. It is essential that



brownfield sites within the city boundary are allocated for mixed use development which includes office development to meet some of this pent-up demand and to facilitate the continued growth of Edinburgh's economy.

Policy HOU5 in the draft city plan states that planning permission will be granted for the change of use of existing buildings in non-residential use to housing. The criteria under this policy does not explicitly exclude strategic business centres and the wording only discusses criteria relating to the loss of retail units to residential uses. Additionally, Policy ECON3 encourages office development as a "significant element" of mixed-use development in Business Centres rather than directing development to office use only and Policy ECON 5 supports the loss of employment and industrial sites to residential use within the urban area.

Where will employment and business development go in Edinburgh in light of the general subject policy support for residential development in many employment, office and business areas (for example, HOU5, ECON 3 and ECON 5)

In representation at the "Choices" stage, LPBZ suggested that the former Casino site and car park were allocated for business or commercial led mixed use so LPBZ are disappointed to see that the site is still located on white land and has not been allocated for a specific use.

Disappointed that this policy only permits major office development within the strategic business centre which is located to the west of the site at Victoria Dock.

#### Forth Ports Limited (0496)

Forth Ports are the Statutory Harbour Authority and the Competent Harbour Authority for the Firth of Forth and perform a number of functions as prescribed by legislation. Forth Ports put in place bye-laws to protect the health, safety and security of both operators and members of the public within its operational estates. They also have a duty to ensure port facilities are securely protected in accordance with International Ship and Port Facility Security (ISPS) code. For these reasons, it is not possible to permit public access through the Port estate.

Forth Ports initiated engagement with the Council to review the Leith Docks Development Framework. Whilst initial engagement was constructive, Forth Ports were advised that the review of the LDDF would take place through the proposed City Plan however the proposed Plan has failed to address the matter.

#### National Galleries of Scotland (0725)

Considers the principle of requirements in Place 4 are reasonable but would benefit from wording changes to increase clarity. As currently worded, the Policy (place 4) does not differentiate between different forms of development that may come forward in the Granton Waterfront Development Framework

#### Sapphire Land (0247)

It would be appropriate to ensure the overall vision for Edinburgh Waterfront contains reference to providing a mix of housing types, densities and sizes, as well as supporting

ancillary uses - the current wording relating to “high density urban quarters” is unhelpful and overly restrictive in this regard.

Crosslane Co-Living SPV 2 Limited (0687)

City Plan should be modified.

Network Rail (0071)

Generally support the proposed new street associated with EW1d (Proposal R1) and the potential to create new development plots as part of the delivery project. However, access into this area is taken from Seafield Road at the junction with Marine Esplanade where there is an existing level crossing. This is a Public Highway Manually Controlled Gate and has a high-risk rating in terms of public safety

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), LPBZ Commercial Ltd (0391)

City Plan should be modified.

Union Property Services Ltd/VRS Ltd (0584)

City Plan should be modified.

Living Streets Edinburgh Group (0486)

City Plan should be modified.

Cockburn Association (0777)

Do not support the first bullet point “comprehensively designed proposals which maximise the development potential of the area”.

Maximising the development potential should not be a policy objective. Need to emphasise that the delivery of sustainable neighbourhoods is the primary objective and one consistent with the 20 minute neighbourhood ambition.

Western Harbour and Central Leith Harbour policy areas need to fully explore the impact of rising sea levels on the suitability and feasibility of development.

Welcome the development principle to create a new Coastal Park at Granton and Granton Waterfront.

Dave Berry (0463)

The city plan needs to start thinking about sea level rise now.

HCPII Properties 101LP (0517)

Query the proposed approach depicted in Map 15 which designates specific sites for specific uses. The urban context of Central Leith Waterfront is changing rapidly. It is overly

rigid to direct commercial-led uses to specific sites, particularly in areas where the office market is relatively weak.

Ocean Point 1 is currently a 9-storey office building located to the south-east of Ocean Terminal shopping centre. Only briefly been fully occupied indicating high density office development may not be optimum land use. Pandemic may result in office demand not fully recovering.

#### SEPA (0012)

Granton and Granton Harbour: City Plan should be modified.

#### Leith Harbour and Newhaven Community Council (0776)

Transformation that has taken place so far is not consistent with this paragraph: - Loss of large areas of green space and removal of more than 80 trees to developments/Tram work. There are several controversial proposed planning applications that are concentrating on high density but certainly not high quality or attracting community support.

The Park however is more than the recommended 800m distance from other recent and planned developments for Central Leith Waterfront that have no public greenspace.

#### Henry Sandercock (0044), Celia Mainland (0447)

City Plan should have much more emphasis on green space.

The tree conservation area should be extended to cover all of North Leith, up to the waterfront.

The Northernmost red-coloured development area of Map 14 should be removed and left as a green space - That section of this proposal contains two ponds which have become vital habitats for wildlife, especially birds. The ponds also provide a key area for exercise. These two wild ponds that have developed naturally at the NE corner of Western Harbour - the park proposals for the rest of the Western Harbour development look very manicured and sterile by comparison.

#### Mark Ockendon (0419)

City Plan should be modified.

#### NatureScot (0528)

There would be benefits to the approach set out in NPF4 and we welcome objectives for a co-ordinated look and a master-planned approach for the whole of the Place 4 area. Ensuring that there is a strategic look at the issues and a wider co-ordination between individual allocations and development sites, will help to ensure the delivery of NPF4 and City Plan objectives, including those for 20 minute neighbourhoods, green/blue networks, active travel provision, the creation of a coastal promenade and the issues relating to coastal defences. A co-ordinated look at these issues would be of practical benefit in relation to consideration of our interests with the Firth of Forth SPA.

Jayne Thurlow (0037)

Object to housing being built on the green space between Western Harbour Terrace and Western Harbour Way. The green space is somewhere for people to walk and for children to play. The city plans emphasise retaining sufficient green spaces for the well-being of residents. Buildings will block light from the existing flats. The view of the Firth and bridges beyond will be lost. The building process itself will produce a high level of disruption and noise for all current residents.

Asda Stores Limited (0142)

City Plan should continue the Adopted LDP allocation of the Asda site as a Local Centre that acknowledges the role that the store plays in the local community and would encourage other local services to locate in the area, in line with the aspirations of the National Planning Framework.

SEPA (0012)

EW1a- City Plan should be modified.

Andrew John Parnell and Brigitta Marianne Sjoberg Parnell (0344)

The listed buildings and their curtilage are allocated partly in the Proposals Map as an "LDP Legacy site" proposal "EW 2b" and partly as "Open Space". Both of these allocations are completely inaccurate and inappropriate.

It is also inappropriate to allocate part of these properties as "open space" as this infers that there is a public access, which there is not. 5 Caroline Park and Caroline Park House including Royston House, are in private residential use. Neither the buildings nor the curtilage are dedicated in any way to public use.

SEPA (0012)

EW1b- City Plan should be modified.

Hilary Hines (0265)

EW1b, EW1c, EW2b, EW2d: Housing proposed for Edinburgh Waterfront is far too dense and the Shore views will be severely damaged by the erection of high rise apartment blocks. This will also result in overcrowded neighbourhoods that are far too dense.

SEPA (0012)

EW1c- City Plan should be modified.

SEPA (0012)

EW2a: Forth Quarter: City Plan should be modified.

#### SEPA (0012)

EW2b: Central Development Area: City Plan should be modified.

#### Sapphire Land (0247)

EW2c Granton Harbour: Sapphire Land may wish to apply for fresh planning consents across their three development plots at Granton Harbour which may result in amendments to previously approved housing numbers in each of these locations.

#### SEPA (0012)

EW2c Granton Harbour: City Plan should be modified.

#### Biffa (0804)

EW2d: North Shore: The West Shore Trading Estate site is a long standing existing industrial estate and therefore an appropriate location for a Waste Transfer Station and Depot. The broad-brush allocation of the area as having potential for housing led development fails to take account of the industrial estate and as such the industrial estate should be removed from the proposals for future redevelopment of the area and a suitable safeguarding distance applied around it. The site is clearly not suitable for housing-led development as introducing housing allocations around industrial premises is at odds with existing operational industrial development.

#### Living Streets Edinburgh Group (0486)

Reference to contributions towards paths for pedestrians and cyclists is not sufficient. All of the sites are accessible by public transport and whilst some are closer to a range of facilities than others, they are all capable of having walking at their heart. Car free developments should be the default expectation.

#### **H29: Silverlea**

#### SEPA (0012)

This reach is part of the Niddrie Burn NFM study and should complement any Pentlands to Portobello environmental improvements projects.

#### **H30: Ferry Road**

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### The Salvation Army (0189)

There are B and C listed buildings adjacent to the site [Ashbrook and Wardieburn House

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

SEPA agree with Proposed Plan Appendix D. No flood risk assessment (FRA) is required.

### **H31: Royal Victoria Hospital**

Ian McRae (0028)

The area cannot deal with the additional impact of this proposal on infrastructure is already overwhelmed e.g GPs, Dentists, Schools are already stretched.

Craigleith/Blackhall Community Council (0403)

Principle a. "Deliver a housing led mixed use development in line with density requirements in part 4, table 2" should not lead to an inappropriate scale of development adjacent to existing single and one and half storey housing in Craigleith Hill Gardens and Craigleith Hill Loan which would have a negative impact on existing residential amenity.

It is notable that wildlife is absent from the list of considerations to be addressed in the present principles.

Jacqueline Christie (0023)

Traffic congestion in the area is already bad, especially around start and end of school periods; schools in the area are already at capacity; more work will have to be done to ensure the flooding issues within the Craigleith areas and Stockbridge have been addressed; and the environmental impact of the current proposal does not seem to have been considered for the loss of very large greenspace/corridor areas

Susie Ross (0440)

This site should be allocated to a new Flora Stevenson Primary School. It would afford a safe and secure location for children in a clean environment unlike the existing school in a dangerous location at the centre of a vehicle congestion area and air pollution. The entire site of currently protected trees and the wildlife would be preserved. There would be room too for the Gaelic School. This would further enhance an area already surrounded by a significant number of educational facilities creating an educational hub.

Inverdunning (Hatton Mains) Ltd (0427)

City Plan should be modified.

Susan Burney (0360), Lesley Moyes (0703), Naomi Appleton (0271),  
Dr Liam Keegan (0389), Helen Mitchell (0484)

There is already more than adequate local availability of shops in the general area.

Victoria Hart (0191)

Development of taller housing would be overbearing to the existing residential housing.

Page 55 3.34 mentions two listed buildings (the East Lodge and Hospital Administration building). There is a third building marked on map 21 p58 in the top left corner of the map – possibly an old stable block.

Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Naomi Appleton (0271)

Increased driveways may result from the reduced parking in this site and there would be a detrimental impact on green space and wildlife.

Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that. It should be car free, so remove reference to limited car parking other than disabled and essential servicing.

SEPA (0012)

Development principles relating to this site and proposals relating to future fitting water management (page 57) should be considered in the context of proposals relating to Crewe Road South.

A multi-agency group has been formed to understand more fully the flood risk and opportunities to this area of Craigleith/Comely Bank.

Elizabeth M Kungu (0063)

There is a likelihood that the requirements of BGN 22 shall be watered down once a developer submits plans.

Simon Thomson (0248)

The site is not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Christopher Fraser (0371)

The proposal has a high density and will impact negatively in terms of increased traffic volumes, flooding and the availability of services such as nursery/schooling, healthcare, recreation.

Dr Liam Keegan (0389)

The objector in particular has a back garden across Craigleith Crescent from the west wall of the Royal Victoria site. The plan for the site shows a new large building coming too close to this on this side of the site.

More apartments without parking as this would force all the old terrace houses to remove old gardens and put in parking.

Elizabeth Morton (0772), Howard Jones (0424)

360 units is excessive. This will have definite effects on existing residents and users of the area, for example health provision, drainage, flood risk, schools, shops, parking, and all forms of transport. These impacts do not appear to have been properly assessed.

Ian R N Stewart (0131)

This site is not "brownfield " in the same sense as say, Orchard Brae. It has a substantial area of green space which forms a part of a "green corridor" running through Pilrig Park, St Marks Park, Warriston playing fields, RBG, Inverleith Park/ Arboretum playing fields & Ferryfield to the east and Ravelston Woods, Craigcrook Park, Corstorphine Hill and Cammo to the west. These form a valuable green lung, recreation options and biodiversity all of which should be preserved to the maximum extent possible. The plan seems to underplay these aspects in favour of housing development.

There are references to existing listed buildings at 3.34 and 3.34c but no mention of how they will be protected or utilised sympathetically in any future development

Subsection g and the map suggest a new exit onto Craigleith Hill Crescent. That is not needed if the existing access to the west is properly managed.

The health and education infrastructures could not cope with 800 additional dwellings

Sewage and drainage remain a problem here. Scottish Water have started work to alleviate catchment problems and backing up in Craigleith Road and Orchard Drive. It remains to be seen how successful this will be. The addition of further dwellings (approximately 360) will place a further burden on upstream and downstream drainage, especially if there are further developments at (Plan) Place 6 (Crewe Road) and Orchard Brae.



The City Plan has a heavy emphasis on housing and housing development. The use of various sites for education / recreation and community purposes are less well considered and there is little sign of how various uses have been evaluated and balanced.

### **H32: Crewe Road South**

#### Police Scotland / Scottish Police Authority (0659)

Police Scotland are supportive of the principle of development however do not support the following aspects of the development principles and diagram:

- The amount and location of proposed greenspace and blue/green infrastructure;
- The appropriateness of the development areas proposed;
- Lower capacity of development; and
- The inclusion and location of the proposed primary school annexe.

#### Ian McRae (0028)

Insufficient consideration to demands on infrastructure - GPs, Dentists, Schools already stretched.

Existing flooding issues.

#### NHS Lothian (0596)

NHS Lothian welcome the reference to the Western General Hospital within the context of the Place Policy.

#### Craighleith/Blackhall Community Council (0403)

City Plan should be modified.

#### Sheila Strathdee (0448)

Support the revised proposals, especially the reduction of the number of housing units proposed, preserving the city skyline, and the very necessary flood prevention measures to be put in place. Should resist any diminution of these measures, especially at the behest of developers.

#### Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

#### Susie Ross (0440)

This site should not be used for additional housing - another housing scheme in addition to those on Orchard Brae will place an unbearable burden on the water sewage system and the area is congested being on a main arterial road into Edinburgh.

Flora Stevenson, Broughton High and Fettes College are particularly going to be affected by new development, although other schools just beyond this will be adversely affected.

There will be detrimental effects in terms of traffic, air quality, flood risk and biodiversity.

Developing the site as proposed in this document would endanger not only the protected species currently on the site but those in Fettes College, Inverleith Park, Comely Bank Cemetery and the RVH.

Cockburn Association (0777)

City Plan should be modified.

Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

Susan Burney (0360)

The provision of shops in the local area is already more than adequate.

Deidre Brock MP (0801)

Any future development must take account of protected species on the site and ensure as far as possible their continued access can be maintained through careful design and planning.

SEPA (0012)

There is a culverted watercourse to the south of the site. Our understanding is that is it culverted underneath Flora Stevenson's Primary School. Since our last site review, a multi-agency group has been formed to better understand the flood risk and opportunities to this area of Craigleith/Comely Bank.

Sheila Young (0251)

City Plan should be modified in respect of suggested condition.

Flora Stevenson Primary School is already at maximum capacity as is Stockbridge Primary School and other schools are some distance away.

Elizabeth M Kungu (0063), Andrew Brown (0007)

Flooding is an ongoing problem for the houses at the lower end of Craigleith Hill Avenue, and these proposals, provided they are enacted in full, should go some way towards

alleviating these problems. City Plan 2030 offers a unique opportunity to have work done to relieve the pressure on the drainage system with a nature based solution and at no cost to the Council.

Jacqueline Christie (0023)

Traffic congestion in the area is already bad, especially around start and end of school periods, schools in the area are already at capacity, more work will have to be done to ensure the flooding issues within the Craighleith areas and Stockbridge have been addressed, and the environmental impact does not seem to have been considered for the loss of very large greenspace/corridor areas.

Christopher Fraser (0371)

Proposal would have a negative impact on availability of services such as nursery/schooling, healthcare, recreation. Traffic volumes and possible additional impacts on floodwaters are also of significant concern.

Helen MacLeod (0364)

The area is prone to flooding.

The development should not change view of new-town skyline and open space should be maintained and improved.

The local primary and secondary schools are already completely full. The children in any new homes would have to travel to school as suggested by City Plan. There is no need for this.

Howard Jones (0424)

The site is a large much needed greenspace within the city periphery, linking other smaller areas of greenspace together for wildlife. It is used by rare wildlife such as Curlews. Area also incorporates major flood issues, as surface water from the Western General Hospital is allowed to drain into the exposed culvert that runs along the gardens of Craighleith Hill Avenue East. Current school at capacity and in an area with pollution problems (air and noise).

Inverdunning (Hatton Mains) Ltd (0427)

the site is part-owned by Police Scotland (which is understood to be a planned disposal) but the remainder of site is in two further ownerships: Royal Mail and a private owner with no confirmation of disposal.

Naomi Appleton (0271)

The north of the site is a regular feeding ground for curlews (and occasionally oystercatchers). It provides a beautiful open view of the Edinburgh skyline. The current proposals might not give due consideration to these two aspects.

Royal Mail Group (0501)

The Edinburgh North West Delivery Office at number 41 Comely Bank is allocated for residential development. The site is an important asset for Royal Mail and there is no short or long term intention in relocating to an alternative location.

Ian R N Stewart (0131)

The comments below apply to Site 6- Crewe Road South on pages 56, 57 and Map 21 , para 3.35

This site (page 56) has not been declared as vacant or about to be vacated. I am unsure therefore what the rubric "Planning permission will be granted....." means or implies. Does it mean acquisition by CPO? Does it mean a decided predisposition in favour of " housing - led development" to the exclusion of all and any other uses? Is this to be in perpetuity? This should be clarified.

This site is not "brownfield in the same sense as say former industrial use , or the Orchard Brae sites. It has a substantial area of "green space" and forms part of a "green corridor" which runs from the east at Pilrig Park, St Marks Park, Warriston playing fields, RBG, Inverleith Park/Arboretum playing fields and Ferryfield; and to the west via Ravelston Woods and Craigcrook park, Corstorphine Hill to Cammo and beyond. These areas singly and collectively form a valuable green lung, offer recreation options and diverse biodiversity all of which should be preserved to the maximum extent possible, if not enhanced. The Plan seems to underplay these aspects in favour of housing and they should feature equally in the Plan

The Plan does not explore other options for this site such as recreation, allotments or exclusive school/community use. The Plan should do this in a balanced way.

The recreation area of the police site at Fettes (ie NW of the current buildings) is frequented by a colony of bats. The location of their nests should be established, and that may constrain any future use of the site, including development. The same area is frequently visited by curlews which feed there on the damp playing fields.

The recognition of capacity problems at Flora Stevenson's school in the form of a proposal for an annexe is welcome. Consideration should be given to a complete new school built to energy efficient standards either here or (preferably) at site 5 to take advantage of cleaner environments. Alternatively the site could be used for the mooted Gaelic High School. The existing Flora Stevenson site could then be treated as part of the Orchard Brae site. There is a need for greater emphasis on public good / community use including a new school. Section 3.35 should address this.

There have been continual drainage and flooding problems in the Craighleith Hill estate, particularly at the Crewe Rd end of Craighleith Hill Avenue where a burn which runs at the bottom of several gardens enters a conduit under Crewe Rd S on its way to the Water of Leith. The result has been flooded gardens and more recently flooded houses. There has also been a case of sewage backup. The addition of some 320 dwellings here as proposed plus 360 at Site 5 (page 55) and possibly about 180 at Orchard Brae are likely to make existing drainage capacity problems even worse. Notwithstanding 3.35m (page 57) nothing should be done with this site until downstream drainage problems have been addressed and no development should take place which would make these problems worse -including the effects of site development downstream in Comely Bank/ Inverleith.

Infrastructure/ capacity problems also apply to education and health provision. Section 3.35 should address this clearly.

The Plan is predisposed to housing led mixed development (para 3.35). It should present a balanced evaluation of other possible uses too-educational; recreational allotments etc.

Para 3.35 refers to 2 electricity substations and at 3.35m the possible relocation of a gas District Governor. Will these all be relocated and if so, to where?

Para 3.35 refers to a development on the corner of Comely Bank Rd and Crewe Rd S equivalent to a 4-storey tenement. Rather than being a "strong urban form" this would be out of proportion with the surrounding area; would dominate that corner and surroundings; and would trap traffic noise and pollution next to the school. If developed this corner should be lower height and be in sympathy with the surroundings.

Para 3.35 e includes a potential new annexe for Flora Stevenson's . This is welcome recognition of capacity problems, but arguably Flora Stevenson's needs a complete new school which would be more energy efficient. It could be located at this site or, preferably at Place 5, with surrounding playing fields away from traffic and in a cleaner environment . There would also be space for a Health Centre / wider community use. The existing school site would then be part of that at Orchard Brae. There has been speculation that this site might be used for a new Gaelic High School. This would be sensible in principle as part of a new educational hub and should be supported at this site or at Site 5.

The Craigleith Hill estate area has had localised problems with flooding and drainage for some time. These have been attributed to lack of capacity in the system to deal with existing volume. The addition of 320 dwellings here plus 360 at site 5 , plus app 180 at Orchard Brae (H33 &H34) would further compromise the existing infrastructure and possibly lead to problems further downstream in Comely Bank/ Inverleith. No development at this density should precede infrastructural problems being rectified.

3.35n refers to a new open river channel along the northern boundary of the site. This might help reduce flooding risk in general at the expense of a localised flood plain but to relieve flooding risk in the Craigleith Hill area, the culvert under Crewe Rd S would need to be renewed and enlarged. The open channel would require respect and responsibility from users of the site and the surrounding areas to prevent it becoming a dumping ground for litter and general misuse leading to problems such as those at Cameron Toll a few years ago; b an open river course might also throw up safety fears, particularly if there is a high incidence of younger school pupils close by.

### **H 33: Orchard Brae Avenue**

Elizabeth M Kungu (0063)

The number of units set out in the housing proposals is the most that should be allowed.

Susanna Sharp (0638)

Too many substantial, old trees would be felled in creating this development - they form an important, natural barrier and are part of the green heritage. There is also insufficient parking, will add pressure in an already congested area

SEPA (0012)

A multi-agency group has been formed to understand more fully the flood risk and opportunities to the wider Craigleith/Comely Bank area.

**H34: Orchard Brae**

Alasdair Grant (0089)

The proposed development is too large.

Finance Development LLP (0688)

Object to the following Development Principle: New proposals must avoid replicating the scale and massing of the existing building. Heights must be lower and the layout / massing must be sympathetic to the surrounding urban form. It is considered that, in order to achieve an appropriate built form and density of development suitable for the surrounding streetscape, it is not necessary for the heights to be lower than the existing.

It is considered that ground floor office uses are appropriate and will assist in the creation of an active frontage to Orchard Brae.

Callum Melville (0155)

The "path" all round the entire site comes very close to the building at 48 Learmonth Avenue and some of the flats at the end of Learmonth Crescent raising concerns about security and privacy.

SEPA (0012)

A multi-agency group has been formed to understand more fully the flood risk and opportunities to the wider Craigleith/Comely Bank area.

Isabel Steel (0245)

No objection to this area of ground being developed as long as the development is sensitive and appropriate for the area. Objections to the current proposals are:

It is a greedy development trying to squeeze in too many flats/houses;  
the height of the proposed buildings is not compatible with the local area;  
the proposed buildings come too close to and crowd existing residences; and

the lack of parking spaces may be in accord with council policy but is completely unrealistic. People will have cars regardless of available spaces and will park in the local Comely Bank area which is already congested. Far more provision for parking should be provided. The lack of spaces also discriminates seriously against the elderly and disabled.

### **H35: Salamander Place**

#### Alison Winkler (0041)

Oppose plan of housing and business use on the former scrap yard plot. Apartments in 10 Salamander Court have bedrooms facing towards this plot – New development will have cause less daylight in these rooms as well as balconies and living rooms overlooking bedrooms. Development will increase traffic along Salamander Place. Since building commenced in the surrounding area for new housing and the disruption caused by the tramworks, noise pollution has gone up severely, impacting quality of sleep and increasing air pollution. Council should support surrounding apartment owners in giving grants for new triple glazed windows if development goes ahead.

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### Hilary Hines (0265)

EW1b, EW1c, EW2b, EW2d: Housing proposed for Edinburgh Waterfront is far too dense and the Shore views will be severely damaged by the erection of high rise apartment blocks. This will also result in overcrowded neighbourhoods that are far too dense.

#### SEPA (0012)

Based on LiDAR, part of the site is below 4mAOD. An FRA is required to assess the risk from the Water of Leith, coastal interaction, including the operation of the harbour. Site may be constrained. Sedimentation studies have been undertaken along the tidal reach of the Water of Leith. Harbour gates control water levels along this reach with a range of flood levels provided depending on future sea level projections and failure of harbour gates

### **H36: North Fort Street**

#### Simon Thomson (0248)

The site is not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site

#### **H37: Coburg Street**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

##### Simon Thomson (0248)

The site is not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

##### Emma Whitfield (0031)

The proposal for housing on this site would massively intrude on the wellbeing of the adjacent building, number 32. The proposed development may drive essential businesses and services out of the area. The area immediately next to the proposal already contains so much newly built housing on a narrow, cobbled street in an historical area of Leith.

#### SEPA (0012)

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site may be constrained due to flood risk. Sedimentation studies have been undertaken along the tidal reach of the Water of Leith. Harbour gates control water levels along this reach.

#### **H38 Commercial Street**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

##### Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.



### SEPA (0012)

The site is approximately 4.8-5.8mAOD based on LiDAR. Sedimentation studies have been undertaken along the tidal reach of the Water of Leith. Harbour gates control water levels along this reach. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further. Draft SFRA identifies an FRA needed to inform proposal and blue/green opportunities.

An AECOM Leith Connections Active Travel Route is also exploring blue/green infrastructure along Dock Street/Commercial Street.

### **H39: Pitt Street**

#### Kenneth MacLean (0046)

This proposal includes existing residential properties and there is concern and confusion about if this are proposed to be redeveloped.

### SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. Although this appears to be picking up the low point along the Water of Leith Walkway. This should be investigated further.

### **H40: Steads Place**

#### Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

#### Leith Central Community Council (0614)

Wish to see options for a future active travel route at high level safeguarded ("Leith Walk Highline") to support connections from Pilrig Park and the North Edinburgh cycle network to East Edinburgh and the coast line between Marine Esplanade and Portobello.

#### Mark Ockendon (0419)

City Plan should be modified.

#### Cockburn Association (0777)

We would strongly advocate a unified urban design framework be prepared to ensure the architectural and streetscape coordination of any new development coming forward

#### Leith Central Community Council (0614)

City Plan should be modified.

## **H41: Jane Street**

### Shortbread House of Edinburgh Ltd (0619)

Consideration must be given to existing businesses in the area. Concerns about existing and proposed access to their business, Shortbread House.

Oppose plans to turn H41 into a housing led mixed-use site. Site is part of Leith's industrial heritage and it is important to allow industry to thrive. Their use is light industrial and dependent on its location to operate. Their unit and other surrounding it have proved important for start up businesses and providing local employment.

Site requires constant visits not possible by further travel/public transport. Need to have opportunity to start up businesses where you live and existing businesses would not exist without this opportunity. Mixed use would only cater for retail and not support businesses such as theirs. Healthcare provision would not be inadequate, and the development would remove two foodbanks.

Full consideration has not been given to employment and commercial needs of the area. Business would not be able to function under new plans. It does not emit vibrations, fumes etc other than the smell of baking, but does create a small amount of noise and requires delivery by small and large vehicles throughout the day. Current plans do not allow for this access to continue.

Business is more than land and buildings, advocates quality of business and skilled workforce created. Plan to expand into site next door as a second bakery additionally supporting tourism. Business would likely be lost/ cease if forced to relocate.

Proposed new sites are not large enough or close enough to existing industrial sites to replace those proposed to be redeveloped.

Safe access is also not being maintained the business. In the development proposal (H41) Jane Street would no longer be a road with vehicular access. This would mean that the business is no longer able to ensure lorries and other vehicles can get on and off site safely. In addition, a cycle path is proposed to go through the car park. This would not allow for vehicles to move safely and would also not allow our forklifts to operate safely in the car park. Proper consideration of these routes should be made before the plan is developed any further.

Plans go against creating 20 minute neighbourhoods. Jane Street area is not an empty brownfield site waiting for redevelopment. It is an area of thriving local businesses and this should be acknowledged rather than just designating the area for housing.

### Deidre Brock MP (0801)

The proposals aim to replace a primarily industrial site with a housing-led, mixed use development which is unsuitable for the Jane Street site. Recent decades have seen the loss of much of Leith's industrial space and to remove one of the remaining sites would have a deleterious impact on the business and commercial needs of the community. Many of the Jane Street industrial units have, in recent years, been utilised as start-ups, with the site even being described as an 'incubator' for small business development.

Many businesses on site are of the view that the residential requirements in the plans would severely impact on their ability to trade. Place 8 development principles specify that units in the new developments would be intended for Class 4 uses. As a result, existing businesses will be unable to carry out their usual on-site operations and forced to move out of the area.

The proposal seems at odds with Econ 5 Employment Sites and Premises 3.241 which states that "redevelopment proposals on all employment sites, regardless of size, need to take into account the impact of activities of neighbouring businesses and in the context of criterion b (the proposal will contribute to the regeneration and improvement of the wider area where relevant) any other regeneration or redevelopment proposals for the wider area"

Questions must be raised over where existing businesses would be expected to relocate and how this relocation would impact on the current Jane Street workers' access to their '20-minute neighbourhood', - this should be a goal attainable for all workers, not just those in office-based, retail or hospitality roles.

Question whether the local area can shoulder another housing led development of this scale. A lot of recent development and approved plans for further housing within walking distance of this site. Must ensure the community infrastructure keeps pace. Question the impact of more housing on one of the city's most densely populated areas has been fully examined.

#### Leith Links Community Council (0617)

Existing mixed-use area (small businesses, offices, light industry, commerce, workshops, garage etc. which all offer good local employment opportunities) should not be replaced by housing-led mixed use which in practice are high density housing schemes with very small amount of other uses. Not clear where the existing businesses would go – contrary to the 20 minute neighbourhood idea.

#### Newbarns Brewery (0653)

Replacing industrial estate with housing-led mixed use is unsuitable for Jane Street. Contrary to Econ 5 Employment Sites and Premises 3.241 which states that "redevelopment proposals on all employment sites, regardless of size, need to take into account the impact of activities of neighbouring businesses and in the context of criterion b (the proposal will contribute to the regeneration and improvement of the wider area where relevant) any other regeneration or redevelopment proposals for the wider area".

Relocating business could lead to loss of jobs/workers. Questions must be raised over where existing businesses would be expected to relocate and how this relocation would impact on the current Jane Street workers' access to their '20-minute neighbourhood'

#### APS Group (Scotland) Ltd (0518)

Proposal will have an unacceptable negative impact on the Jane St Industrial Estate, displacing many businesses. The estate contains single storey industrial and warehousing units, including a mix of unit sizes, as well as yards, office facilities and on-site parking. The importance of this area to the life of the city and to numerous

businesses working across various sectors, should not be underestimated the estate is presently full, or very close to full. The Estate should be recognised as a valued resource and protected as such within City Plan. Further engagement with its multiple occupiers and land owners is needed.

A more sustainable alternative would be to change City Plan to include an element of greenfield land release, in order to protect and avoid losing this valued small business community.

Ramsay Cornish Auctioneers Ltd. (0685)

The proposals aim to replace a primarily industrial site with a housing-led mixed use development which is unsuitable for the Jane Street site. Recent decades have seen the loss of much of Leith's industrial space and to remove one of the remaining sites would have a deleterious impact on the business and commercial needs of the community.

Many of the industrial units have been utilised as start-ups, with the site even being described as an 'incubator' for small business development. Place 8 development principles do not, however, make provision for these businesses so any units provided in the new developments would be for Class 4 use only.

Paul Gibson (0559)

Proposed redevelopment of Jane Street Industrial estate and turning it into residential properties will be of huge detriment to the community of Leith and have a significant impact on local tourism.

Many of Leith's industrial estates are hives for the local community, places that artisan producers are allowed develop their skills and hubs to nurture new businesses. Many have local residents working in them helping to keep their carbon footprint to a minimum.

Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Inverdunning (Hatton Mains) Ltd (0427)

H41 (Jane Street) is a large area with multiple ownership. In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business.

SEPA (0012)

There seem to be inconsistencies in how to deal with Jane Street. No flood risk assessment is required in Appendix D but there is a request for the Water of Leith flood extent to be considered here and in the Strategic Flood Risk Appraisal.

Leith Central Community Council (0614)

City Plan should be modified.

Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

**H42: Leith Walk/Manderston Street**

SEPA (0012)

Some clarification is needed to avoid confusion about this site. Previously it was identified in the Strategic flood risk assessment (SFRA) as Leith Walk (depot) but there are other references and names Appendix D refers to H42 as Leith Walk/Manderston Street.

**H43: West Bowling Green Street**

Water of Leith Conservation Trust (0392)

The main walkway follows the river from Anderson Place round to West Bowling Green St and the along the river to join the other spur from West Bowling Green St. This should be included on the map as a pedestrian route

There are challenges with the connection with H44 to the walkway (although the walkway is welcome)

Point i on page 63 is welcome but should be strengthened for ALL development by the river. Maintain a 20m buffer zone between the top of the bank to the Water of Leith and built form and use the buffer to create natural space for resilience and overland flow. This would benefit biodiversity and create an attractive river edge. This space can also be used for recreation and amenity.

Leith Links Community Council (0617)

The proposal should not be included in the Plan as it stands given existing mixed-use area (small businesses, offices, light industry, commerce, workshops, garage etc. which all offer good local employment opportunities) should not be replaced by housing-led mixed use which in practice are high density housing schemes with very small amount of other uses. It is not clear where the existing businesses would go – contrary to the 20 minute neighbourhood idea.

SEPA (0012)

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in

conjunction with the Developer Pack to identify whether more site-specific detail is required.

Site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

Inverdunning (Hatton Mains) Ltd (0427)

In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period. As such, the identified site should be removed from specific reference.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Synergy Group Fitness (0806)

Support the provisions of the Plan which suggest that ground floor business units will be provided but require assurance that suitable premises will be provided for existing businesses that do not wish to relocate.

City Plan should clarify how housing land requirement can be met when allocations have been made on land that is not promoted by landowners - CPO would take many years

Should Scottish Government Reporters be minded to support the redevelopment of Place 9, we appeal to them to require further discussion and consultation with the landowners and business in this area.

Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Jodi Duffin (0264)

Object to the proposal for the following reasons:

- Risk of traffic accidents with multiple sites in the area, the area is already a danger with multiple building sites and planned road closures
- Area has building fatigue, residents have had non-stop site developments/disturbance/noise issues which make it an unpleasant area to live in
- New housing would be directly into WBS housing, blocking more day light and causing privacy issues
- Will cause issues to on street parking, in the short term with more builders parking illegally in the area and long term for residents.

#### Katie Soane (0260)

The circa 600 new homes planned for the area will be around 6 stories which will impact on the designated view of Arthurs Seat from Newhaven Road. The scale of development will impact of the character of the neighbour, reduce the opportunity for local population to exercise reduce local employment opportunities and impact the local beverage production.

The proposal does not confirm to aspirations laid out in 20 minutes neighbourhoods - removing employment sites providing jobs and access to services within walking distance for the existing local population. Also existing facilities will be stretched - no new nurseries, schools or healthcare facilities being provided.

#### **H44: Newhaven Road 1**

#### Leith Central Community Council (0614)

The proposal is not clear on mapping.

#### SEPA (0012)

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach.

Site may be constrained due to flood risk and may not be suitable for residential development. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

#### Inverdunning (Hatton Mains) Ltd (0427)

In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period. As such, the identified site should be removed from specific reference.

#### Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

#### Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Katie Soane (0260)

Circa 600 new homes planned for the area will be around 6 stories which will impact on the designated view of Arthurs Seat from Newhaven Road. The scale of development will impact of the character of the neighbour, reduce the opportunity for local population to exercise reduce local employment opportunities and impact the local beverage production.

The proposal does not confirm to aspirations laid out in 20 minutes neighbourhoods - removing employment sites providing jobs and access to services within walking distance for the existing local population. Also existing facilities will be stretched - no new nurseries, schools or healthcare facilities being provided.

**H45: Newhaven Road 2**

SEPA (0012)

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach.

Site may be constrained due to flood risk and may not be suitable for residential development. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further

Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

Inverdunning (Hatton Mains) Ltd (0427)

In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period. As such, the identified site should be removed from specific reference.

Leith Central Community Council (0614)



This proposal is not clear on maps.

This proposal could overshadow the Water of Leith and/or existing buildings.

Inverdunning (Hatton Mains) Ltd (0427)

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (0736)

Due to existing leases Bonnington Industrial Estate is unlikely to come forward for redevelopment until the latter part of the City Plan period.

Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Liane Montgomery (0030)

The proposal will affect privacy of current residents, the building will be noisy, parking in the area will be adversely affected and there is insufficient local infrastructure which already has issues with drainage/sewage.

Katie Soane (0260)

The circa 600 new homes planned for the area will be around 6 stories which will impact on the designated view of Arthurs Seat from Newhaven Road. The scale of development will impact of the character of the neighbour, reduce the opportunity for local population to exercise, reduce local employment opportunities and impact the local beverage production.

The proposal does not confirm to aspirations laid out in 20 minutes neighbourhoods - removing employment sites providing jobs and access to services within walking distance

for the existing local population. Also existing facilities will be stretched - no new nurseries, schools or healthcare facilities being provided.

#### **H46: Bangor Road**

##### Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that

##### SEPA (0012)

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

##### Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

##### Inverdunning (Hatton Mains) Ltd (0427)

In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period. As such, the identified site should be removed from specific reference.

##### Simon Thomson (0248)

The proposal site not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

##### Ali Hall (0072)

The proposal will stop light coming into the representor's ground floor flat, which faces the proposed new building.

#### **H47: South Fort Street**

##### SEPA (0012)

This proposal requires a flood risk assessment (FRA) however this is noted as 'm' in Appendix D and instead this should be changed to a 'Y'. There is no mention of FRA under the place policy. The draft SFRA mentions an FRA is required and a buffer along the Water of Leith as well as green infrastructure.

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach

Site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

#### Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

#### Inverdunning (Hatton Mains) Ltd (0427)

In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period. As such, the identified site should be removed from specific reference.

#### Simon Thomson (0248)

The proposal site not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

#### **H48: Stewartfield**

#### Rachel Ross (0784)

Relocating businesses to outskirts of the city will increase traffic/congestion and have adverse effect on businesses and their customers. Many businesses will not be compatible as part of housing-led mixed use due to deliveries, noise and smell

#### Living Streets Edinburgh Group (0486)

Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

SEPA (0012)

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach.

The draft SFRA mentions an FRA is required, consideration of blue/green corridors, and the opportunity for a strategic SUDS basin to manage surface water on site and to assist with reducing surface water flood risk in the area.

Site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

Inverdunning (Hatton Mains) Ltd (0427)

In response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period. As such, the identified site should be removed from specific reference.

Simon Thomson (0248)

The proposal site not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Gareth Hutchinson (0290)

Permit parking proposals for the area should be cancelled

David Williams (0643)

This proposal is dismantling Leith's rich light industrial heritage. Precedents would be set which will seriously alter the well-established sensibility of the area. There needs suitable alternative locations for businesses affected. Will lead to job losses or employees having to travel much further to relocated sites. Also concerns about lack of sufficient infrastructure for increased population.

Jennifer Reaves (0299), Anne Meikle (0286), Sarah Farrell (0473)

The proposal would have the following detrimental impacts:

- Setting or character of a listed building (Category C, the Mill Wheel) which attracts many visitors would be affected.
- Site is above Bonnyhaugh Lane and higher level housing would overshadow the area and lead to loss of light, sunlight and privacy.
- Recent and future new builds in the area will put pressure on levels of traffic feeding into main routes through increased numbers of cars and delivery vans.
- Local new builds have not added proportionate increases in health and social infrastructure. Additionally the pandemic has led to the loss of local retail outlets and the opportunity to 'shop local'. The current light industrial use offers several well used services and some leisure opportunities.
- Mature trees and shrubs currently fringing Stewartfield and Bonnyhaugh Lane provide habitats for wildlife which add character to the area.

Liane Montgomery (0030)

The proposal will affect privacy of current residents; building will be noisy; insufficient local infrastructure; impact existing issues with drainage/sewage and parking in the area will be adversely affected.

Gillian Rae (0571)

The proposal fails to meet a key principle of Scottish Planning Policy with regard to the 'right development in the right place' for the following reasons:

- Layout of this proposal is not appropriate to the site and its impact on existing environment is contrary to design principles that that development should fit into existing surrounding environment and not change them adversely.
- Proposal for the ground floor to be made available for business units. However, the proposed residential density (100-175) is very high and would involve the construction of tall buildings. Given the size of the site, a lower density would be more appropriate in order to maintain the character and appearance of the area.
- The reference to height and mass is rather vague. It is likely that the Council would prepare a development brief prior to inviting any planning application – but this is in no way guaranteed by the Place 14 principles.
- A new residential development here could result in significant loss of habitable light and threaten the privacy of the single aspect rear facing properties at Burns Place, 1A Bonnyhaugh Lane and adversely affect the residential amenity of neighbouring owners.
- Will negatively impact on the existing road network and the traffic assessment undertaken to date is insufficient. Flats built without parking spaces will not prevent car ownership in this area.
- Would adversely impact local amenity in terms of traffic movement, construction impacts, visual impact and the loss of small but unique and valued outdoor green networks.

- Further work is required to demonstrate that the development will not exacerbate historic flooding issues in the area local to the proposed development.
- Risking the amenity of this area would have a negative impact on the wellbeing of people already living area with the highest population density in Edinburgh. There are trees, self-seeded scrub and wildflowers on the periphery fence of the existing industrial site which help to screen the industrial units from view, add amenity and support our wellbeing, while they also sequester carbon, reduce flooding, mitigate air pollution, cool urban environments, enhance local biodiversity and are a home for wildlife living in and around the river. New trees would simply not be ready to provide the same greenspace, wellbeing and ecosystem services for decades.
- The process of demolition and rebuilding would involve significant carbon release. Contrary to aim of carbon neutral by 2030
- Although the 'Place 14' principles talk about height, mass and housing typology they do not make reference to materials or design. The Place 14 principles need to be strengthened to give greater emphasis on good design and greater protection to the character, appearance and amenity of the neighbouring area.
- The small but unique private residence at the entrance to the estate has been included within the plan so risks compulsory purchase. However, the amenity it adds to the area has been underappreciated
- The redevelopment will almost certainly result in the loss of local service industries. Should not be replacing the existing light-industrial buildings that are not at the end of their commercial viability with other small business units located in the basement of a residential complex with little / limited street visibility.
- Existing businesses are providing income, jobs and local services for people within the community, enabling 20 minute lifestyles.
- The intention to open a link between Redbraes and Ladehead in Bonnyhaugh is also worrying. These two areas were designed and have existed as cul-de-sacs decades ago and provide tranquil residential areas with a low footfall on either side providing an area for safe street play and a sense of community. There are already several routes on the other side of the river that are well-surfaced, with good lighting Should maintain the perception of safety gained from the footfall on these existing corridors and preserve the more secluded aspect within the Bonnyhaugh estate.

#### Hew Dalrymple (0238)

The site should retain mixed use development allowing small business parks to remain as they are an essential part of the community.

#### Framework (Edinburgh) Limited (0743)

The proposal would have the following reasons detrimental impacts:

- It would impact ability to trade of existing businesses which do not fall within Class 4 business use with no offer of viable replacement industrial sites.

- Relocating businesses to the outskirts of the city will entail lengthy commutes for employees and their customers contrary to " 20 Minute Neighbourhood " goal.
- More housing will create fewer places to work locally and put an increased strain on an existing overburdened community infrastructure .
- The proposed development and loss of one of Leith's few remaining light industrial sites would set an undesirable precedent.

#### Katie Soane (0260)

The circa 600 new homes planned for the area will be around 6 stories which will impact on the designated view of Arthurs Seat from Newhaven Road. The scale of development will impact of the character of the neighbour, reduce the opportunity for local population to exercise, reduce local employment opportunities and impact the local beverage production.

The proposal does not confirm to aspirations laid out in 20 minutes neighbourhoods - removing employment sites providing jobs and access to services within walking distance for the existing local population. Also existing facilities will be stretched - no new nurseries, schools or healthcare facilities being provided.

#### Katrina Danson (0301)

The proposal is unacceptable for the following reasons:

- Insufficient parking in the area.
- Already considerable congestion at Newhaven Road..
- Loss of open space, less daylight will have effect on mental health.
- High buildings will overlook existing property – effect on privacy.

#### **H49: Coruna Place**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

##### Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### **H50: Bonnington Road**

##### Christine Nurse (0323), Catherine Ness (0642)

Proposal would have a detrimental impact on the local economy and would further exacerbate the problem of there being limited infrastructure and shopping available in the

Bonnington area. The trading estate currently provides an essential service to the local community and to those visiting the area. There are no outlets selling equivalent items to the public in the local vicinity. Removal of the trading estate would therefore lead to an increase in road traffic.

Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Sarah Roberts (0630)

The industrial estate generates employment, allows for agile new business to develop and provides vital services to local residents. Removing the retail outlets is not supporting the 15 minute city idea. More residential developments will require park space/gardens/allotments/shops.

Richard Cherns (0476)

It is indicated the proposal is unacceptable for the following reasons:

- No detail in terms of height and appearance. But 56 units in this space will be detrimental to the park. Buildings over 2 stories will overshadow a children's play park.
- Along with other development in the area, proposal will greatly increase traffic. Car parking will also be an issue.
- The nature of the commercial units there would change in any condensed development. Unlikely to provide affordable space for current occupiers.

Forth District Salmon Fishery Board - Crown Estate Scotland (0346)

City Plan should be modified.

SEPA (0012)

The proposal may not require a flood risk assessment (FRA), although it is recognised the Council's Flood Team may have requested that surface water management to be considered within the site design and this may form the basis of an assessment.

**H51: Broughton Road**

Inverdunning (Hatton Mains) Ltd (0427)



The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

The site is sufficiently elevated above/set back from Water of Leith, with approximately 10 metres elevation between site and Water of Leith.

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach.

Site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site.

**H52: Iona Street**

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further.

**H53: Albert Street**

Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Matthew Gason (0090)

The proposal will have negative impact on quality of life and the appeal, value and marketability of the neighbouring tenement which currently have some open views to Carlton Hill.

#### SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

#### **H54: St. Clair Street**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

##### Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### SEPA (0012)

A flood risk assessment (FRA) is requested in Proposed Plan Appendix D. The risk identified was from surface water flooding only. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further. Site was identified in the draft SFRA as an opportunity site for a strategic SUDS basin.

#### **H55: Seafield**

##### The Royal London Mutual Insurance Society Ltd (0149)

The estate is 100% let and tenant leases are in place until November 2036, which is beyond the duration of the Plan.

The landholding is situated in a location well suited for employment use within the City's established urban area. It is accessible by foot, cycle and vehicle.

There is a lack of evidence to support the proposed Edinburgh CityPlan 2030 (PECP) approach to redevelopment of land including employment (mainly industrial) land to satisfy the requirement for housing. Plan is not supported by background papers which consider the impact of its strategy on established employment and business uses.

It is not clear to what extent The 'Edinburgh Commercial Needs Study: Mixed Use Delivery (ECNS)(December 2020)' which has been undertaken by Ryden on behalf of the Council has informed the Council's approach. It is not identified as a background report to the plan but is located within the Choices for City Plan 2030 consultation webpage. The implications for the industrial market of progressing with the brownfield strategy are identified in the Report and are significant - Implied potential is the loss of around 250,000 sq. ft. of industrial space annually to 2030.

The Report makes some key observations, which must not be overlooked:

- Proposed loss of stock is skewed towards the north east of the City and new stock has been developed only in the west of the City (p15).
- 30% of the 30,000 jobs supported by industrial stock could be affected
- Not all industrial stock identified for redevelopment is of a poor standard
- In assessing the impact on the Bonnington area, the Report cautions that there will still be an overall loss of job numbers and services from the area and that this should be balanced against the residential and economic impact of new residents in the area.
- The case studies demonstrate that policy requirements to replace employment uses on site are tending to yield only a small number of flexible small units, some of which are designed to convert to flats if they do not attract tenants, and are thus unlikely to contribute to the replacement need if industrial stock is lost at the potential rate indicated.

The Strategy fails to recognise that:

- The industrial market services the demands of the local urban market;
- The market is performing well with limited supply potentially suppressing or displacing demand, particularly for smaller units;
- The strategy represents redevelopment of 30% of the City's industrial stock including premises such as Royal London's which is modernised and well suited to market needs, full, popular and achieve high rents;
- Jobs would be lost and businesses would be displaced beyond the City;
- The potential loss of around 250,000 sq.ft. of industrial space annually to 2030 which is around five times the historic rate of stock loss;
- The potential stock loss rate around six times the current, active rate of new industrial development; and
- A very active industrial development programme would be required to reaccommodate even a proportion of this displaced activity.

#### David Thomson (0538)

**Access.** The addition of residents from the proposal would lead to unacceptable traffic congestion. On its landward side it is bounded by the operational railway. The only exits are via the King's Road traffic lights (a bottleneck), Leith (complex and inadequate road system) and Fillyside Road - residential area of Craigentinny.

**Pressure on residents Parking.** Many new developments only provide a single parking space but households may have more than one car.

**Pressure on visitors parking.** With the beach-front set to be developed along Seafield, there will also need to be adequate parking for people from elsewhere.

**View Blocking.** The high-rise nature of the housing developments is likely to block the sea view from the houses in Nantwich Drive and Wakefield Avenue. Consideration should be given to the population density, which can be ameliorated if the Council will constrain developers to build homes of a size and height appropriate to the area.

Utility of Beach and Prom. Portobello Prom and Beach are now established as a highlight of Edinburgh life and tourism, but the area is actually quite small. There are cyclists, dog owners, water sports enthusiasts, swimmers and simply families enjoying a nice time on the sand. If the number of people living nearby is increased by this development, the space each can use, and consequently the utility value of the place to the people is reduced

#### Scottish Water (0342)

This site is located approximately 50m from the boundary of Seafield WwTW. In addition to the proximity to the WwTW, there are a number of large strategic wastewater pipes intersecting this site that may require considerable measures to ensure they are protected from any impact of development. This could potentially have an impact on the financial viability of the site.

#### Alastair Cameron (0145)

Concerned that a 'housing-led mixed use' development at Seafield will lead to missed opportunities to develop a coherent community, based on 20-minute neighbourhood principles.

#### Manse (Seafield) LLP (0212)

It is not appropriate or necessary to preclude granting planning permissions at Seafield until a Place Brief has been finalised and approved - unnecessarily restrictive and could lead to a considerable delay in bringing the housing development forward in the timescales relied upon by the Council to meet its housing land requirement. Place 15 requires a Place Brief and Masterplan to be prepared for an extensive area covering the whole of the Proposal H55 but the Council has not consulted all of the many landowners affected by Proposal. The single largest landowner – Royal London – who control about a quarter of the land, have objected to Proposal 55 because they have no intention of bringing their land forward for redevelopment. If significant areas of land cannot be procured for redevelopment, then the Place Brief as a whole will not be deliverable.

#### Anne Thomson (0551)

Proposal will lead to very limited prom resources being over-stretched.  
Proposal will have an effect on current prom users who will find hundreds, if not thousands, of residents sharing the prom and the beach with them.

Proposal will create traffic problems. There are already traffic jams along Seafield Road.

#### Mark Ockendon (0419)

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV

charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Ursula Wright (0662)

Open space for productivity is important and must not be overlooked or omitted.

Living Streets Edinburgh Group (0486)

As it stands there is a lack of adherence to transport hierarchy. There is reference to active travel, but not to pedestrian priority.

RSPB (0648)

It is not correct to say in Section 3.51 that “The mitigation measures noted above would ensure development of the Seafield Industrial Estate would not have a significant effect upon the Firth of Forth SPA and the Outer Firth of Forth and St Andrews Bay Complex SPA; the structure or the functioning of the Qualifying features (sps) populations or the habitats that they support.” Development of Seafield may cause acoustic and visual (including lighting) disturbance to waders feeding and roosting within 150 meters of the site, particularly during construction but also once new development is occupied/operational and human activity. A series of mitigation measures are mentioned in Section 3.50 but these mitigation measures DO NOT effectively mitigate occupied/operational disturbance

Action Party (0250), Jennifer Elliot (0791), Anna Brand (0742), Gemma Sethsmith (0694), David Cooper (0735), Serge Marti (0745)

The development at Seafield requires a stronger community steer:

- Place Brief: Establish a community-led body to prepare a Place Brief for the site. A Place Brief should have been developed in collaboration with the community to feed into the Seafield proposals in the City Plan.
- No development should take place until the Masterplan is produced
- No informal consultation between landowners/ developers and council/ planners should take place in parallel with the Place Brief or Master planning processes, or else it needs parallel input - or oversight - by all relevant community representatives.

Seafield requires a community-centred comprehensive holistic approach:

- Welcome a joined-up environmentally-sensitive, socially-inclusive community development at Seafield that creates a vibrant sister community.
- Oppose any process leading to a negative development

Expect that a development that is responsive to the following 7 points:

- Housing that is climate resilient and responsive - inclusive and affordable new homes build to adequate thermal efficiency to allow for low/zero carbon heating.
- Transport: a design led approach.

- Community infrastructure: a new school and facilities centrally located, focussed on a neighbourhood centre and transportation hub.
- Green space: open community green spaces and recreational space
- Coast, nature and climate change: ensure net biodiversity gain
- Prom and beach: deliver a renewed and sustainable Seafield prom
- Integrated development: No development unless an overall Masterplan is approved by the wider community.

#### Edinburgh Dog and Cat Home (0310)

States that the Edinburgh Dog and Cat Home (EDCH) is a valued and widely recognised facility for dog and cat welfare and provides an important facility across Edinburgh and the wider area. Maintaining service and improving the facility is fundamental to EDCH. Notes many benefits of current site in terms of location, but also the challenges of the physically constrained site that is aging and requiring maintenance and improvement which could be addressed through a new, modern, purpose built facility elsewhere. They are considering options of refurbishment, redevelopment or relocating to a new site and would like the plan to be flexible to support these options.

They request that City Plan 2030 recognises the development potential of their Seafield site by including it within the H55 allocation, adopting the same criteria used by the Council in assessing Site 383 of the Environmental Report at Main Issues Stage (CD024), including broad environmental constraints, public transport accessibility and physical and social infrastructure, the EDCH site would achieve many if not all criteria under the same analysis, retaining the potential to improve existing facilities either in situ or in a new location.

Currently, the EDCH site is outwith the H55 allocation. In considering the case for its inclusion it is stated that the site would meet the assessment criteria of the wider Seafield site and could make a meaningful contribution consistent with the plan's strategy to promote sites within the urban area for housing. Inclusion of the site within Place Policy 16/H55 site provides an opportunity for comprehensive masterplanning, increased capacity, improved connections and approach to flood risk and drainage.

#### Peter Allen (0336)

Future development at Seafield must provide education, and healthcare infrastructure and community facilities. If only a "contribution" is made then these facilities will have to be provided elsewhere which will run counter to the principles of creating a 20-minute neighbourhood.

Development principle a): "A housing –led mixed use urban extension with a sense of community...". In order for this to be achieved, the community must lead on some of the housing development, so that the housing being provided is what the community actually want.

City Plan should mention the sewage treatment works at Seafield as this is a key part of the area and the smell must be dealt with in order to create a thriving community in the area.

Anne Thomson (0551)

Proposal will require adequate parking for residents. In addition, some of the development should be parking for beach-users.

An investment in a prom upgrade and leisure activity support will be required.

Use of the railway should be considered. It could become a tram or express bus route.

NatureScot (0528)

As currently proposed there is concern that the requirements in principle for development at Seafield will not support the required flood risk and coastal erosion appraisal - it appears that the flood risk and coastal erosion appraisals will be developer led. Flood risk and coastal erosion along Edinburgh's coast will be of such significance that appraisal should be led by the Council, taking a strategic approach to the issue through development of some form of Coastal Adaptation Plan.

Welcome the requirements of the associated BGN57 proposal but consider that Seafield's location offers more opportunities for green blue network enhancement and extension and that incorporating this into site requirements would help this site meet overall City Plan 2030 aims and objectives.

Paragraph 3.52 presents a conclusion of no "significant effect" which is terminology used at an earlier stage of Habitats Regulations Appraisal than the Appropriate Assessment stage. The correct term, and conclusion, is that there will be "no adverse effect on site integrity".

Miller Homes (0256)

Regulation 48 of The Conservation (Natural Habitats, &c.) Regulations 1994 provides that a competent authority (in this case the Council), may agree to a plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

A Habitat Regulations Appraisal, dated September 2021, is included in the evidence base of the City Plan. It identifies that two place based policies are likely to have significant effect on Firth of Forth SPA and Outer Firth of Forth and St Andrews Bay Complex SPA; Place 4 – Edinburgh Waterfront and Place 15 – Seafield.

However, the Habitats Regulations Appraisal effectively delegates the acceptability of development at Place 15 – Seafield to project-specific habitat regulations appraisal and recommends that specific wording be included in the City Plan to this effect. Not only does the City Plan fail to incorporate the recommended wording suggested in the Habitats Regulations Appraisal but the Council are not able to confirm that development at Place 15 – Seafield would not have an adverse effect on European sites until such time that the project-specific habitat regulations appraisal is undertaken.

Regulation 49 says that if the authority is satisfied that, there being no alternative solutions, the plan or project must be carried out for imperative reasons of overriding public interest (which may be of a social or economic nature), they may agree to the plan or project notwithstanding a negative assessment of the implications for the European site.

It has not been demonstrated development at Place 15 – Seafield would not have an adverse effect on European sites. As such, the Council should have considered alternative solutions with a lower potential for adverse impacts on European sites, such as this site, but they have not done.

Julie Robertson (0210)

Need to safeguard areas of Seafield Road for business. Does not support removing businesses to further away or hoping that they cease to trade. Car dealerships are needed. Require supporting infrastructure for homes.

Diana Cairns (0452)

Support housing on this site but the design must be community-led so it is of a human scale, is sympathetic to the local area and does not overload local infrastructure.

Lawrence Marshall (0702)

The portion of Seafield running from King's Road to the sewage works is essentially a westwards extension of Portobello. The beach must not be overshadowed.

Arnold Clark Automobiles Ltd (0750)

Generally understanding of the need for the assessments required in Appendix D – Technical Requirements for Housing Proposals but City Plan should state that the Council undertake the studies in Appendix D in early course to inform the upcoming masterplanning exercise.

Portobello Amenity Society (0612), Stephen Ian Hawking (0469)

Support for a mixed use but subject to an imaginative enforceable Masterplan and Place Brief being developed that has been thoroughly consulted on and demonstrably has the support of the surrounding communities. The Place Brief should show how it has met the aspirations of existing surrounding communities.

Suzanne McIntosh (0409)

Infrastructure required in relation to H55: a new primary school, an extension to the high school, a new medical surgery, good cycle infrastructure, public transport, the Edinburgh suburban rail line - a station at Seafield and a potential future tram extension could be planned for as part of this major expansion.

Oonagh O'Brien (0585)

City Plan should be modified.

Inverdunning (Hatton Mains) Ltd (0427)

Proposal is a large site with multiple ownership – part is owned by Lothian Buses and potentially could come forward in plan period but the remainder is owned by a range of



investment companies, private owners and car dealerships - disposal timescales are unknown.

#### SEPA (0012)

A flood risk assessment (FRA) is requested in Proposed Plan Appendix D. Historic maps indicate the presence of numerous small watercourses through the site which may be culverted. An FRA is required which assesses the coastal flood risk to the site. Consideration should also be given to any culverted watercourses. Future sea level rises should also be taken into consideration.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. The draft SFRA mentions strategic attenuation pond to mitigate flooding.

#### Portobello Community Council (0206)

In line with emerging NPF4 and infrastructure first principle to allocation and development then it should be clarified that any development in advance of full production of the Place Brief, FRA and erosion appraisal, development principles, masterplan should be considered premature. Presently only development ahead of the Place Brief is stated as being premature.

#### **H56: Sir Harry Lauder Road**

#### Portobello Community Council (0206)

Site requirements need to be refined to provide clarity to the proposed scale and preferred location of the class 4/ commercial uses that are to be required within the allocation.

Reference should also be made to the need to provide landscaped streetscape and active travel connectivity to reflect the newly created condition in the neighbouring section of Fishwives Causeway (The recently completed Barratt development)

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### SEPA (0012)

A flood risk assessment FRA is requested in Proposed Plan Appendix D. There is uncertainty, however, regarding the Braid/Figgate Burn Flood Protection Scheme. An FRA which assesses the Figgate Burn is needed. Consideration should be given to any culverts/bridges which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Draft SFRA identifies consideration of blue/green connections which should also be considered.

### **H57: Joppa Road**

Mary Burgess (0456), Beverley Burgess (0605)

The density of housing would be out of character with the surrounding area.  
It would lead to an increase in car parking in an area that already has an extremely high car density with unmanaged on street parking.  
The height of the building would lead to substantial loss of daylight/sunlight for neighbouring properties.  
There would be a very lengthy period of traffic and noise disruption on a busy main road whilst the development took place.  
My house backs on to the proposed site and development would lead to loss of privacy.

Kim McFarlane (0698)

Increase in building heights would lead to overshadowing of our garden – loss of light and privacy.

Craig McIntyre (0709), Nadia McIntyre (0704)

Development would lead to loss of light/privacy, along with the visual amenity of Joppa Road being eroded/lost.  
Site is subject to flooding.  
Site has already had several planning applications refused.

Portobello Community Council (0206)

Any proposed development on this site should be carefully handled and guided by clear site requirements. While we welcome reference to the Conservation Area as set out in Appendix D, we would advise that additional reference should be added to reflect the need for built form to relate to the setting and scale of neighbouring buildings in the Conservation Area.

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

Oonagh O'Brien (0585)

Object to the proposed density of buildings and the potential impact this density will have on the quality of life of the residential units in the immediate neighbouring vicinity including potential loss of light, potential loss of privacy and increased problems with traffic, access and parking.

Morgan Smith (0788)

Additional housing would bring an increase in demand for car parking in an area that is already under strain.

The creation of 8 housing units would likely necessitate an increased height in comparison with surrounding buildings - this would also create further restrictions in the amount of sunlight in neighbouring houses.

New houses on the site would be incongruous with the existing style and period of surrounding buildings.

Development would result in a prolonged period of disruption/noise and traffic problems in a main thoroughfare.

Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

Bridget Campbell (0706)

Development would be at a greater density of housing than is typical for this area. A development of 8 units would likely to result in a structure of such height that would negatively impact on the daylight into the homes and gardens of existing properties and dramatically alter the skyline in this conservation area.

John Gerard Holligan (0412)

The density of 8 potential dwellings on that site seems excessive and out of keeping with this area of Joppa. Concerned about the potential loss of privacy/light to our home and garden if it were to be over looked by a large building.

Corrie Fairweather-Mills (0527)

Development would cause loss of privacy and potential impact to light to neighbouring properties. If properties are accessed via Bedford terrace at the back this will be too much pressure on the cul-de-sac.

#### **H58: Eastfield**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

##### Simon Thomson (0248)

The site is not available for housing development as it is currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

##### Portobello Community Council (0206)

Welcome the proposal to set development 15m back from the Brunstane Burn but consider this must also clarify that public access should be facilitated in this safeguarded space- through the provision of a path which connects from Eastfield/ Edinburgh Road to the coast and linking to the proposed Active Travel path ATSG21. This will be a necessary link to facilitate access and appreciation of the coast and is a welcome and natural extension to the Brunstane Burn Path which currently terminates at Eastfield/ Edinburgh Road.

We also note the existing trees on the roadside edge and consider that the site requirements should require for a landscape frontage to be retained or reconfigured. Maintaining a landscape frontage will help retain a positive degree of perceptual separation between Musselburgh and Portobello.

##### SEPA (0012)

The FRA required for this proposal must assesses the risk from the Brunstane Burn, coastal flood risk, and the interaction between the two sources of flood risk. Consideration should be given to any culverts/bridges which may exacerbate flood risk and we would highlight the comments we made to the draft SFRA which mentions that the site should be considered for removal. Comments from the CEC Flood Team also mention erosion susceptibility in the draft SFRA. The site will likely be constrained due to flood risk.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

**Modifications sought by those making representation(s):**

## **Various North and East Proposed Sites**

### Suzanne Bruce (0565)

No modification specified but it is indicated that the proposed North and East housing proposals should be deleted.

### Howard Jones (0424)

It is indicated many, if not all, of the housing proposals in the North and East area should be deleted from the Plan.

## **Place 4 - Edinburgh Waterfront**

### SEPA (0012)

It is indicated more detail should be provided on how flood risk should inform design and layout.

It is indicated City Plan should use common terminology to specify a Flood Risk Assessment instead of a Flood Risk Appraisal

### RSPB (0648)

It is indicated that further appropriate assessment should be undertaken and any development proposed must be assessed on a case by case basis to ensure impacts are adequately addressed.

### LPBZ Commercial Ltd (0391)

It is indicated that the proposal description should be modified to reflect the fact the proposal is essentially a large housing allocation.

The car park element of the site at 2 Ocean Drive should be allocated in the emerging development plan for a high-density mixed-use development which includes office uses as there is a need for this type of use and to facilitate the continued growth of Edinburgh's economy.

The emerging local development plan should ensure that a policy is in place to protect existing employment uses in Leith and encourage office development as part of any residential development proposed.

To achieve a truly mixed-use community at Edinburgh's Waterfront, particularly in line with the emerging national policy relating to 20-minute neighbourhoods, it is essential that office space is included in this list of uses stated in Policy Place 4.

The Strategic business centre area should be widened and allocated for a mix of uses (to include the site at Ocean Drive) so that offices can come forward alongside residential uses to create the desired mixed use.

It is indicated that the former Casino site and car park should be allocated for business or commercial led mixed use and that Place Policy 4 should be amended to permit office development beyond the strategic business centre.

#### Forth Ports Limited (0496)

Pages 47 to 49 Place 4 Maps 14, 15, 16 and 17 require to be revised, re-routing footpath and cycle connections to exclude the operational land within the Port estate.

Page 49 Place 4 Ew1d and Ew1e Northern and Eastern Docks Amend bullet point as follows:

Delete **c.** “the Seafeld Industrial Estate (EW 1d) is the subject of a waste management / combined heat and power safeguard (see Policy Inf 18)”

Replace the text at bullet point **d** with the following text, “Cycle and pedestrian routes will require to be routed around the boundary of the operational Port of Leith estate.” - to recognise that cycle and pedestrian routes are required to be routed around the operation Port of Leith estate.

Map 10 marks out part of the Port of Leith as a ‘business and industrial area’ however it does not include all appropriate parts of the operational port estate. The designation should be extended to include Britannia Quay (BQ) and a new designation should be created for Land South of Edinburgh Dock (LSED), ‘Port of Leith Area with Potential for Change:

- Amend map 10 to include land at Britannia Quay for Business and Industry and amend map 10 to show new designation ‘Port of Leith Area with Potential for Change.’
- Page 48 Map 15 requires to be revised to identify land at BQ as land for Business and Industry and identify LSED as ‘Port of Leith Area with Potential for Change.’
- Page 35 New supporting text should be provided after paragraph 2.139 and before paragraph 2.140 which states “There is potential for land within the Port of Leith, located to the south of Edinburgh Dock to be released from Forth Ports’ operational port estate. Potential exists for mixed use development which may include residential development, student housing, hotel, leisure, commercial, including retail and business uses. However, if land is not released and/or subsequent Planning Permission for such development is not forthcoming land will continue in operational port and associated uses and business and industry uses commensurate with port operational use will be supported.”
- Page 33 Resources and services: Amend paragraph 2.136 last sentence as follows: “Accordingly, this plan supports existing and new waste management facilities at operational quarries and safeguarded sites. Seafeld Industrial Estate (EW1d) has potential to accommodate the development of a new waste management facility but is not safeguarded for such use.” Amend map 9 to remove identification of the site.
- Page 130, Inf 14 Rail Freight: Delete the second sentence of paragraph 3.215, which reads “Keeping a reduced general freight rail head to the east in Seafeld will

complement the safeguard for a waste management facility in that location (see Policy Inf 18).” There is no justification provided for the safeguarding of a waste management facility at Seafeld.

- Page 132 Inf 18 Provision of New Waste Management Facilities: Delete the following text, “Seafeld Industrial Estate is designated EW 1d on the Proposals Map for a waste management facility incorporating thermal treatment with energy recovery. Other development proposals at Seafeld will only be permitted if they do not adversely affect this waste management option.”
- Amend paragraph 3.233 last sentence as follows: “Land at Seafeld Ind (identified as EW 1d) has locational advantages: it is sufficiently remote from housing areas; it has the benefit of rail access; and it has an outlet in nearby regeneration and potentially industrial uses for energy recovered after thermal treatment. Accordingly, it’s potential as a location for energy from waste and combined heat and power uses is recognised.”
- Page 49 Amend relevant bullet points as follows:
  - Delete” c. the Seafeld Industrial Estate (EW 1d) is the subject of a waste management / combined heat and power safeguard (see Policy Inf 18)”
  - Replace the text at bullet point d to recognise that cycle and pedestrian routes are required to be routed around the operation Port of Leith estate with the following text, “Cycle and pedestrian routes will require to be routed around the boundary of the operational Port of Leith estate.”

#### Related Changes -

- Page 9, Map 1 – The City Plan Spatial Strategy - Identify Britannia Quay as ‘Industry’ / ‘Employment Centre’.
- Identify Land South of Edinburgh Dock as ‘Port of Leith Area with Potential for Change.’
- Page 10, Map 2 – The City Plan Spatial Strategy:
  - Identify Britannia Quay as Business and Industry Area
  - Identify Land South of Edinburgh Dock as ‘Port of Leith Area with Potential for Change.’
  - Relocate Strategic Active Travel Project and Safeguards and Active Travel Safeguards from operational port estate boundary
- Page 27 Map 7 – Remove residential designations in respect of Britannia Quay and Land South of Edinburgh Dock
- Page 31 Map 8: Remove and relocate ‘active travel safeguards’ (both strategic and local) and ‘indicative schools proposals’
- Policy inf 10 Cycle and Footpath Network page 129: Amend the policy to recognise that it will not always be possible to provide active travel routes as identified in the proposed Plan. The following revision to the Policy is proposed.“... Development will not be supported which would:
  - a. prevent the implementation of proposed cycle paths and pedestrian/wheeling routes shown on the Proposals Map and Part 4, safeguarded routes identified in this plan, other routes identified in the Council’s Active Travel Action Plan, or other routes identified through Place

Policies and Development Principles or Place Briefs following community consultation, unless it is demonstrated that the routes cannot be delivered. Alternative routes may be required where it is not possible to deliver the proposed routes.”

- Table 3 page 166: Re-route proposal ATSR1 – Edinburgh Waterfront Promenade. Amend description text to address the requirement to re-route around the operational Port of Leith estate boundary as follows, “Form a continuous walkway/cycleway extending for almost 17km from Joppa in the east to Cramond in the West. The route will not pass through the Port of Leith operational port estate and will require to be routed around its landward boundaries.”
- Western Harbour – Proposal GBN44d G52 requires to be amended to reflect the consented Park which has an area 4.4ha
- Ew1b Central Leith Waterfront
- Proposals Map – Identify Britannia Quay as Business and Industry Area and Identify Land South of Edinburgh Dock as ‘Port of Leith Area with Potential for Change.’

#### National Galleries of Scotland (0725)

Suggested wording of Policy Place 4:

c. *for residential development*, proposals should include a mix of house types, sizes and affordability

f. *where relevant to development proposals*, provide or contribute towards education, and healthcare infrastructure and community facilities.

Criterion g split after first sentence to new criterion for clarity.

Request that the heading above para 3.22 ‘Granton’ is updated to include site references “EW 2a-d”, to correspond with the Proposals Map.

Request minor drafting alterations to paragraph 3.29 to make it clear that ‘The Art Works, Granton’ and the ‘National Collections Facility’ are one and the same.

Request minor alterations are made to the seven Development Principles (a to g), which follow paragraph 3.29.

a. Appropriate re-use of the B listed Madelvic Car Factory and C listed Madelvic House should be a priority development. *Where appropriate*, the design of ....

b. A route for a tramline along Waterfront Avenue is to be safeguarded with a stop by the ~~National Collections Facility~~ *The Art Works, Granton* site,

d. *Where possible*, all routes should be lined by active frontages, *recognising that an active frontage can take different forms*

#### Sapphire Land (0247)

Specific wording should be included within the policy to make it clear the Council would be supportive of low, mid and high-density residential-led development.

#### Crosslane Co-Living SPV 2 Limited (0687)



The allocation of the Ocean Point 2 site on 'Map 15 – Central Leith Waterfront' should be revised to housing-led mixed use development.

Network Rail (0071)

The Seafield Industrial Estate (EW1d) allocation should make clear where the waste management / combined heat and power safeguard is to be located. This should not be within the Network Rail land ownership in this location

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), LPBZ Commercial Ltd (0391)

The key for Map 15 evident in the adopted LDP is included at page 47

Union Property Services Ltd/VRS Ltd (0584)

The potential to accommodate higher densities should be specifically encouraged as part of the waterfront regeneration area.

Living Streets Edinburgh Group (0486)

Place 4 principle g. needs a clear statement on the transport hierarchy and walking in the principles that will be applied throughout development in all locations.

Contributions should be sought for upgrading pedestrian infrastructure in surrounding areas, not just linking paths.

Cockburn Association (0777)

The first bullet point "comprehensively designed proposals which maximise the development potential of the area" should be merged with the second point – "provision of a series of mixed-use sustainable neighbourhoods that connect to the waterfront, with each other and with nearby neighbourhoods"

A revised set of land-use allocations should be produced that actively plan for increased storm surges and sea-based flooding.

Some small pavilion buildings and a larger focal building could erode the positive values of the park. These would also displace activity better directed toward existing businesses.

Dave Berry (0463)

The policy needs to address the likely increase in sea level arising from global heating. The city plan needs to start thinking about this now, for example by building a sea wall, and/or requiring buildings to be raised above ground level.

HCPII Properties 101LP (0517)

Sufficient flexibility should be built into City Plan 2030 to respond to the rapidly changing urban context.

Request Map 15 is updated to reflect and support a range of development types across Leith Waterfront which would be supportive of a mixture of uses including potential residential or hotel uses at Ocean Point 1.

#### SEPA (0012)

Provide more detail on how flood risk should inform design and layout

Granton: The culverted watercourse should be considered for flood risk potential as well as coastal flood risk/erosion.

Flood defence system referred to in Coastal Granton section 3.25 - The requirements behind the system should be clarified: is it to protect existing development or new development? Setting back development from the coast may offer a more long-term sustainable solution rather than increasing the area of development which may need further protection.

Granton Harbour – The strategic flood risk assessment is referenced, which we support. We advise that the area for this strategic flood risk assessment is extended to support and inform development along the entire Leith/Granton Waterfront.

The principles of this Place should be integrated with considerations of blue green infrastructure with active travel, 20 minute neighbourhood, biodiversity, net zero and inclusivity objectives. SEPA would strongly recommend further consideration of the 'Green Facilitator model taken forward in Dordrecht, Holland' which uses 'green social workers' to take forward hyperlocal change at street level implementing a broad suite of measures reflecting climate resilience/net zero/biodiversity enhancement.

#### Leith Harbour and Newhaven Community Council (0776)

It is indicated that para 3.15 should be stronger in emphasising high quality and generating community support.

Make Map 15 up to date to show any of the recent developments already Underway. Development of Western Harbour (EW1a: a. b. & c.) already under way and includes large Park and new School that is supported.

It is indicated park/open space needs to be provided within 800m distance from other recent and planned developments for Central Leith Waterfront that have no public greenspace.

It is indicated Page 48 Central Leith Waterfront Development Principles should be amended as follows:

- b. Provide clarity on how to create a publicly accessible waterside path given the types of developments that are proposed.
- c. Provide clarity on how the development will meet open space standards.
- d. Mention existing heritage, listed and conservation areas and need for new housing to compliment this. Also need to encourage support for small independent industrial units that provide local business opportunities.

- e. Address how flood risk is already having effect in the area for local residents

It is indicated Pages 49 Northern & Eastern Docks (EW1e & EW1d) should be amended to reflect the following:

- Address issue about reduction/loss of major Tern Colony, and removal of greenspace, trees and hedging having impact.
- Note that views from the shore will be a factor when considering proposals for new larger, higher and denser buildings already underway e.g. Rennie's Isle development, Skyliner. Crosslane and Ocean Terminal.
- The coastal route to include Salamander Street that is already highly polluted and busy with proposed new developments that will tunnel the street, be overpowering and reduce light. It is also not coastal as buildings obscure any views/access to coast
- Plans must be conditional ensuring Open Space strategy is adhered to.

#### Celia Mainland (0447)

Policy Place 4 needs much more emphasis on green space.

The tree conservation area should be extended to cover all of North Leith, up to the waterfront.

#### Henry Sandercock (0044), Celia Mainland (0447)

The Northernmost red-coloured development area of Map 14 should be removed and left as a green space.

#### Mark Ockendon (0419)

Requirement B: "views from The Shore will be a factor in considering proposals for new larger buildings" - add "which will be restricted in height and in keeping with a historic design"

#### NatureScot (0528)

Paragraph 3.24. should be changed as follows: "appropriate mitigation measures were identified, which will be relevant to all future development to ensure there will be no adverse effect on the site integrity of the Firth of Forth SPA and the Outer Firth of Forth and St Andrews Bay Complex SPA."

The final mitigation measure following paragraph 3.24 (page 50), requires amendment to: "Prior to consent, developers will be required to agree the full scope of the ECoW (environmental clerk of works) role with the Planning Authority and in consultation with NatureScot."

Coastal Granton: Whereas development principle a) on page 51 appears to establish the principle of flood defence only towards the east end of the new park, principle f) could indicate an intention to prevent any coastal flooding through it. We recommend that an

adaptive approach to coastal management should be adopted as a Development Principle. Reference to flood prevention should be either removed from the principle a) or further clarified.

Jayne Thurlow (0037)

It is indicated that proposal EW1a should be deleted.

Asda Stores Limited (0142)

City Plan should continue the Adopted LDP allocation of the Asda site as a Local Centre.

SEPA (0012)

**EW1a-** Leith Western Harbour: A flood risk assessment (FRA) is required to assess the risk from the Water of Leith and coastal interaction giving due consideration to predicted sea level rise. The site will likely be constrained by flood risk. A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

Access/egress will also require consideration.

As this area is identified for numerous development plots we would recommend the council consider a holistic approach and undertake a wider FRA which will inform suitable development locations and land-use types. Site will likely be constrained due to flood risk. Sedimentation studies have been undertaken along the tidal reach of the Water of Leith. Harbour gates control water levels along this reach.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further. An AECPM Leith Connections Active Travel Route is exploring green blue infrastructure along Dock Street/Commercial Street.

Andrew John Parnell and Brigitta Marianne Sjoberg Parnell (0344)

The allocation as an "LDP Legacy site" proposal, if it is to be retained, should be moved west of these properties. None of these properties should be allocated as open space.

SEPA (0012)

**EW1b** - A flood risk assessment (FRA) is required to assess risk from coastal flooding considering future sea level rise and coastal processes.

Due to large areas earmarked for development around Leith Docks, a holistic approach to flooding, and climate change is recommended.

Access/egress will also require consideration.

Sedimentation studies have been undertaken along the tidal reach of the Water of Leith. Harbour gates control water levels along this reach. Review of the surface water 1 in 200

year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer

Hilary Hines (0265)

EW1b, EW1c, EW2b, EW2d: A much larger proportion of land should be designated for green, natural, open space and play areas.

Amend plan to limit block height to a maximum of six storeys high.

SEPA (0012)

**EW1c- Leith Waterfront (Salamander Place):** A Flood risk assessment (FRA) is required to assess risk from coastal flooding considering future sea level rise and coastal processes. Due to large areas earmarked for development around Leith Docks, a holistic approach to flooding, and climate change is recommended.

Access/egress will also require consideration.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

SEPA (0012)

**EW2a: Forth Quarter:** Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

SEPA (0012)

**EW2b: Central Development Area:** It is indicated that this allocation should recognise that a culverted watercourse is identified on site and this site extends close to the Forth Estuary.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

Sapphire Land (0247)

**EW2c Granton Harbour:** The total housing figure of 1,546 should be treated as 'indicative'.

SEPA (0012)

**EW2c Granton Harbour:** A flood risk assessment (FRA) is required to assess risk from coastal flooding considering future sea level rise and coastal processes. Due to large areas earmarked for development around Granton, a holistic approach to flooding, climate change, and coastal erosion is recommended.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

Biffa (0804)

**EW2d: North Shore:** It is indicated that this proposal should be revised to retain the West Shore Trading Estate and safeguarding Biffa's Waste Transfer Station and Depot from housing-led development.

SEPA (0012)

**EW2d: North Shore:** A flood risk assessment (FRA) is required to assess risk from coastal flooding considering future sea level rise and coastal processes. Due to large areas earmarked for development around Granton, a holistic approach to flooding, climate change, and coastal erosion is recommended.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

**H29: Silverlea**

SEPA (0012)

A flood risk assessment (FRA) is required to assess risk from the Niddrie Burn/Brunstane Burn and tributaries. This reach is part of the Niddrie Burn NFM study and should complement any Pentlands to Portobello environmental improvements projects.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

**H30: Ferry Road**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

The Salvation Army (0189)

There are B and C listed buildings adjacent to the site [Ashbrook and Wardieburn House]. The design of the development should seek to fully understand and preserve and/or enhance the setting of the listed buildings adjacent to the site.

Simon Thomson (0248)

It is indicated the proposal should be deleted from the plan.

**H31: Royal Victoria Hospital**

Ian McRae (0028)

It is indicated that further assessment on impacts on infrastructure is required as this has been insufficient.

Permanent upgrades required in terms of flood risk before any further development.

Rather than upgrade Flora Stevenson Primary School, it should be relocated, with playing fields to Crewe Road South site.

Craigleith/Blackhall Community Council (0403)

Policy principles should be strengthened to give greater priority to the amenity of existing adjacent housing as well as the greater protection of biodiversity on the site.

Development Principles for the Royal Victoria Hospital site in para 3.34. An explicit reference to the protection of biodiversity (policy Env 21) should be added to the list as the Site is also important for wildlife.

Jacqueline Christie (0023)

It is indicated that this site is used for a new larger Flora Stevenson PS with a large greenspace.

The old Flora's site could also be developed into affordable flats (not too many) with on site parking and extensive landscaping to assist with run off for flooding and nature.

Susie Ross (0440)

This site should be allocated to a new Flora Stevenson Primary School.

Sheila Strathdee (0448)

It should also be considered to use this area to build a new Flora Stevenson's school.

It is indicated that further detail on the kinds of units proposed is needed given how high the number is and the increased pressure on the local infrastructure.

All possible flooding alleviation plans should be non-negotiable and built-over and paved areas should be kept to a minimum.

It is indicated that it should be made clear that public park and gardens are required and on the preservation of this as a wildlife site and corridor, with trees etc., existing walls and old buildings retained.

It should be clear also that the skyline should not be adversely affected .

It should be stipulated that sufficient school places and services, such as doctors, dentists etc. are guaranteed.

Inverdunning (Hatton Mains) Ltd (0427)

Delete Place 5 including H31 reference on Map 21. Site not likely to be available in plan period as shortlisted for site for Gaelic secondary school.

Susan Burney (0360), Lesley Moyes (0703), Naomi Appleton (0271),  
Dr Liam Keegan (0389), Helen Mitchell (0484)

There should be no shops on this residential site .

Victoria Hart (0191)

Page 55 Development Principle a says “a. Deliver a housing-led mixed-use development in line with the density requirements in Part 4, Table 2”. This should say that the development should respect surrounding residential character which is predominately 1/1.5 storey bungalows.

The status of the third building marked on map 21 p58 in the top left corner of the map – possibly an old stable block - should be clarified.

Mark Ockendon (0419)

Place 5, requirement E: "Demonstrate pedestrian priority throughout, providing limited private car parking, all on-street" - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Naomi Appleton (0271)

It is indicated that increasing access to the green space and mature trees by people should not spoil wildlife habitat.

It is indicated that increased driveways may result from the reduced parking in this site and that City Plan should resist such moves.

Living Streets Edinburgh Group (0486)

The policy should use “must” instead of “expected to”.

SEPA (0012)

We would recommend that any development here takes into account surface water runoff and any nearby small watercourses as part of a holistic approach. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to/within the site. This should be investigated further.

Elizabeth M Kungu (0063)

It is indicated that it should be clear that the requirements of BGN 22 shall not be watered down once a developer submits plans.

Simon Thomson (0248)

It is indicated that the site should be removed as a housing proposal.

Christopher Fraser (0371)



It is indicated the housing proposal should be removed or decreased in units proposed.

There should be associated plans to considerably expand supporting services.

Dr Liam Keegan (0389)

It is indicated that there is an objection to the layout of the site in its impact on house(s) to the north side of Craigleith Road.

Object to insufficient details of the proposal being available.

It is indicated that there is an objection to building more apartments without parking.

Elizabeth Morton (0772), Howard Jones (0424)

It is indicated that the proposal should be removed or density and number of units being reduced.

Howard Jones (0424)

Site would benefit from re-use as hospital site instead of over-use within the constraints of the Western General site.

Ian R N Stewart (0131)

Site would be better to be retained by the Health Board and used for redevelopment: for example a replacement Eye Pavilion.

In the context of the plan, the site should be used to build a replacement for Flora Stevenson's school and depending on scope a health centre and community facilities. Gaelic High school could be co located here.

Colony of bats here and should be addressed specifically at para 3.34 with equal weight as given to trees.

### **H32: Crewe Road South**

Police Scotland / Scottish Police Authority (0659)

Request that the development principles diagram for Place 6 (map 21 on page 51) should be amended:

- A more appropriately scaled green edge with new areas of greenspace integrated with the development;
- More appropriate development areas with two zones of development - a higher density development zone at the south of the site and a lower density zone 2 in the northern zone to mediate between urban and lower density spatial structure; and
- The Flora Stevenson school annexe should be removed from the development principles diagram until school requirements are more resolved and fully justified. At

the very least, the potential school should be located to a more appropriate, less central part of the site.

The wording of the following development principles should also be revised:

- Deliver a housing-led mixed-use development in line with the density requirements in Part 4, Table 2. - Request that the density of the site is increased from 256 units to 380-450 units to maximise the use of the brownfield site and to respond to the characteristics of the site and surrounding area.
- Development principle b) should be revised to state: "Respect green landscape setting of Inverleith Conservation Area. Retain and enhance greenspace on northern and eastern boundaries with a new structure of tree/woodland planting and a blue-green infrastructure buffer and reinforce green network between Comely Bank Cemetery and Inverleith Park." - The amount of proposed greenspace on the site, particularly along Fettes Avenue should be reduced and replaced with a more appropriate landscaped perimeter buffer with new open space provision proposed within the development site. The amount of greenspace on the site should also be reduced to take into account the significant open space provision, including allotments, which already exists in the immediate area.
- Development principle e – should be deleted. Do not consider that the proposed plan or its supporting education appraisal provides sufficient justification for or evidence of the need for a new annexe to Flora Stevenson Primary School on the site, or evidence to justify the requirement for a school site of 0.8ha.
- Development principle j) should be amended to state: "Demonstrate pedestrian priority throughout, providing limited private car parking". The wording of this principle should be consistent with the wording of the neighbouring Royal Victoria Hospital site which allows provision of limited private car parking. Both sites have similar accessibility and therefore justify similar provision.
- The unlettered development principle regarding an open river channel should be updated to make it clear that any proposals for a new open river channel should be fully informed and justified by the findings and requirements of a detailed flood-risk and surface water management assessment/plan for the site.

#### Ian McRae (0028)

It is indicated that further consideration should be given to impact on infrastructure - GPs, Dentists, Schools already stretched.

Issues with flooding – permanent upgrades required before any further development.

Rather than upgrade Flora Stevenson Primary School, it should be relocated, with playing fields, to Crewe Road South site.

#### NHS Lothian (0596)

Given the proximity of the area to the Western General Hospital, NHS Lothian would welcome reference to the Western General Hospital Place Brief, or for the Place Policy to adopt similar Placemaking Principles, to ensure any new development at Crewe Road South forms good linkages with the Hospital.

Craigleith/Blackhall Community Council (0403)

The policy states that "the developer shall upgrade any remaining length of culvert.....under Crewe Road South.." We recommend the policy wording be strengthened to say "the developer shall upgrade and increase the capacity of any remaining length of culvert....."

Sheila Strathdee (0448)

The option of using local space for a complete rebuild in line with modern educational needs should also be considered.

The option of further medical or social care provision, e.g. in the way of a new Health Centre and day-care for old folk should be considered.

Mark Ockendon (0419)

Place 6, requirement J: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Susie Ross (0440)

New transport arrangements are not needed- the area is very well-served with an excellent bus service. It is already approachable by bicycle and foot.

This site should be used for a new Eye Pavilion - It would have access to the innumerable hospital features at the WGH, including ambulances and meeting rooms and research facilities etc

The greenfield site could be retained for the endangered curlews, the many other unusual birds, protected bats etc. and returned to its earlier function as allotments.

Cockburn Association (0777)

Existing trees should be protected as a matter of principle. Also advocate the removal of large areas of hardstanding where not required and their return to green space. Substantial levels of new tree planting should form part of any development masterplan. It should be stated that the TVIA must proceed any development coming forward for this site.

Living Streets Edinburgh Group (0486)

Development principle j. "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." Support this statement if reinforce by clarifying circumstances for very limited car parking i.e. cut out wriggle room.

Susan Burney (0360)

Do not support the provision of commercial premises.

Deidre Brock MP (0801)

It is indicated City Plan should make clear protected species on the site are protected and ensure as far as possible continued access can be maintained through careful design and planning.

SEPA (0012)

We advise of the need to be explicit that a flood risk assessment is required in paragraph between 3.35 m & n

The relationship between this site and future-fitting water management for the Royal Victoria Hospital Site should be drawn out and made explicit.

The confirmed presence of a culverted watercourse within/on the boundary of the site should be investigated to inform development layout. This site is key to the successful management of flood water in the area and a holistic approach is required.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

Sheila Young (0251)

Suggested condition in respect of this site should be put in place, - " a flood alleviation measure which will involve diverting the culver under Crewe Road Sought, upgrading that stretch and having it run as an open watercourse along the site currently occupied by Police Scotland at Fettes HQ".

Development at the site at Crewe Road South and nearby should provide for mixed use aspects including an annexe to Flora Stevenson Primary School and community healthcare facilities.

Elizabeth M Kungu (0063), Andrew Brown (0007)

It should be made clear there will be no relaxation of the requirements in terms of BGN 22 as once a developer is involved they will pressure the council to remove these requirements from the development plan

Any development on the Crewe Road South site, must include proposals to mitigate the adjacent current flooding problems. The Strategic Flood Risk Assessment does not recognise the flooding currently impacting on properties immediately adjacent to the site.

Elizabeth M Kungu (0063)

City Plan should make clear that the current proposed numbers of units are the maximum number allowed, and are not increased, and that the proposal is a mixed development including social housing.

Jacqueline Christie (0023)

It is indicated that the proposal is not supported as proposed.

The site would be suitable for a new larger Flora Stevenson PS with a large greenspace. The old Flora's site could also be developed into affordable flats (not too many) with on site parking and extensive landscaping to assist with run off for flooding and nature.

Christopher Fraser (0371)

It is indicated that the proposal is not supported.

Notwithstanding the above, the large volumes of high density housing proposed should include plans to considerably expand supporting services.

Helen MacLeod (0364)

This site should not be developed for housing.

If this proposal is to remain in the Plan however it should be made clear new development should not change view of new-town skyline and open space should be maintained and improved, with an opportunity for annex to Flora Stevenson primary school to provide to provide outdoor learning space given schools are already at capacity.

Need some kind of flood alleviation measure perhaps creating an open watercourse along the site currently occupied by Police Scotland at Fettes HQ.

Howard Jones (0424)

It is indicated the proposal is not supported.

The existing site would be put to better use by being used to provide a low-level new primary school to allow Flora Stevenson's to relocate. Current Flora Stevenson School site is more appropriate for housing if housing is needed in this area.

Inverdunning (Hatton Mains) Ltd (0427)

This site should not be a housing proposal and is a potential windfall opportunity at best.

Naomi Appleton (0271)

It is indicated that the proposal should make clearer provision for the preservation of the green space at the north of the site, which is a regular feeding ground for curlews (and occasionally oystercatchers too). It also provides a beautiful open view of the Edinburgh skyline. The current proposals might not give due consideration to these two aspects.

Royal Mail Group (0501)

Remove the Edinburgh North West Delivery Office and re-allocate as business and industry area under policy Econ 4.

Iain R N Stewart (0131)

It should be clarified what is meant/implied by the statement "Planning permission will be granted..."

It is indicated that the site should not be developed for housing, or if it is then this should not build on existing areas of greenspace.

City Plan should explore other options for this site such as recreation, allotments or school uses.

Section 3.35 should particularly address the potential for the site for a replacement Flora Stevenson High school or the mooted Gaelic High School

The location of bat nests should be established, and that may constrain any future use of the site, including development. The same area is frequently visited by curlews which feed there on the damp playing fields. These points should be recognised and addressed in section c page 56.

It is indicated that, Notwithstanding 3.35m (page 57), nothing should be done with this site until downstream drainage problems have been addressed and no development should take place which would make these problems worse -including the effects of site development downstream in Comely Bank/ Inverleith.

Section 3.35 should address Infrastructure/ capacity problems applying to education and health provision.

Will the 2 electricity substations and gas District Governor be relocated? If so, to where?

It is indicated that the culvert under Crewe Rd S would need to be renewed and enlarged and safety needs to be addressed in respect of the new river channel.

**H 33: Orchard Brae Avenue**

Elizabeth M Kungu (0063)

City Plan should make clear the proposed number of units are the maximum number allowed and the development is to be a mixed development including social housing.

Susanna Sharp (0638)

It is indicated this proposal is not supported, at least in the form proposed as too many substantial, old trees would be felled in creating this development - they form an important, natural barrier and are part of the green heritage. There is also insufficient parking, will add pressure in an already congested area.

Notwithstanding this, tall blocks of flats should not be allowed and new buildings should be located away from the existing housing and not have principal windows placed to overlook the existing housing.

SEPA (0012)

We would recommend that any development here takes into account surface water runoff as part of a holistic approach. Linked to adjacent site H34.

**H34: Orchard Brae**

Alasdair Grant (0089)

It is indicated that the proposal should be reduced in scale.

Finance Development LLP (0688)

It is requested that the development principle relating to height is amended to say 'no higher'.

It is requested that this allocation for 124 residential units is amended to accommodate residential with ancillary office use (an application has been submitted on this basis).

Callum Melville (0155)

It is indicated that the "path" all round the entire site is removed or amended since it comes very close to the building at 48 Learmonth Avenue and some of the flats at the end of Learmonth Crescent raising concerns about security and privacy.

SEPA (0012)

We would recommend that any development here takes into account surface water runoff as part of a holistic approach. Linked to adjacent site H33.

Isabel Steel (0245)

It is indicated that the proposal should be reduced in scale to be lower in height and reduce the number of flats/houses as well space these apart from existing homes. Increase parking provision within the development.

**H35: Salamander Place**

Alison Winkler (0041)

It is indicated this proposal should be deleted.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated this proposal should be deleted.

Hilary Hines (0265)

It is indicated that a lower density of houses should be proposed as the presently proposed levels are far too dense and will result in overcrowded neighbourhoods.

A much larger proportion of land should be designated for green, natural, open space and play areas.

SEPA (0012)

We would recommend the council take a holistic approach to development within the tidal reach of the Water of Leith and harbour area to inform development type, location and mitigation.. Access/egress will also require consideration.

**H36: North Fort Street**

Simon Thomson (0248)

It is indicated the proposal should be deleted.

SEPA (0012)

Flooding issues adjacent to the site should be investigated further.

**H37: Coburg Street**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

Indicated the proposal should be deleted.

Emma Whitfield (0031)

It is indicated this proposal should be deleted.

SEPA (0012)

Consider a holistic approach and undertake a wider FRA which will inform suitable development locations and land-use types as this area is identified for numerous development plots. An FRA is required to assess the risk from the Water of Leith and coastal interaction giving due consideration to predicted sea level rises. Access/egress will also require consideration.

**H38 Commercial Street**



Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated this proposal is deleted.

SEPA (0012)

An FRA is required to assess the risk from the Water of Leith and coastal interaction, incorporating future climate change

Access/egress will also require consideration.

### **H39: Pitt Street**

Kenneth MacLean (0046)

It is indicated that the proposal should be clear on whether existing residential properties on-site would be demolished.

SEPA (0012)

Flooding issues adjacent to the site should be investigated further.

### **H40: Steads Place**

Living Streets Edinburgh Group (0486)

Reinforce development principle f by clarifying accessible parking and cutting out wiggle room.

Leith Central Community Council (0614)

Wish to see options for a future active travel route at high level safeguarded ("Leith Walk Highline").

Mark Ockendon (0419)

Place 7, requirement E: add "and restrict development height to ensure clear sky views are maintained"

Cockburn Association (0777)

City Plan should make provision for unified urban design framework .

Cockburn Association (0777), Leith Central Community Council (0614)

Make provision for the proposed extension of the Leith Conservation Areas which proposes to add the former railway embankment and bridge abutments into the area.

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

**H41: Jane Street**

Shortbread House of Edinburgh Ltd (0619), Deidre Brock MP (0801), Leith Links Community Council (0617), Newbarns Brewery (0653), APS Group (Scotland) Ltd (0518), Ramsay Cornish Auctioneers Ltd. (0685), Paul Gibson (0559)

It is indicated this proposal should be deleted.

Mark Ockendon (0419)

Place 8, requirement F: "Demonstrate pedestrian priority throughout, providing accessible parking only (no private car parking) and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Place 8, requirement H: add "and restrict development height to ensure clear sky views are maintained".

Inverdunning (Hatton Mains) Ltd (0427)

Map 22 – replace H41 and H46 references with “Place 8”.

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

A proportion of the site is owned by the Council and should be retained but the balance of the site should be removed as an allocation. Site should be considered as potential windfall only with no commitment to housing.

SEPA (0012)

Clarify flood risk requirements.

Leith Central Community Council (0614)

Add to Jane Street Development Principles: more new green space and tree planting

Map 23 – Bonnington Cluster: Wish to see the Powderhall Green Corridor (conversion of disused railway line between St Mark's Park and Easter Road, and further east) safeguarded as a linear park with multiple access points (steps, ramps) connecting

developments east of Easter Road to St Mark's Park and the North Edinburgh path and cycle network.

Living Streets Edinburgh Group (0486)

Support statement on pedestrian priority if reinforced by clarifying accessible parking i.e. cut out wriggle room. Pedestrian priority throughout must mean exactly that, so any reference to active travel route is not a substitute for that.

**H42: Leith Walk/Manderston Street**

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

**H43: West Bowling Green Street**

Water of Leith Conservation Trust (0392)

Map 23 - Bonnington cluster: The main walkway follows the river from Anderson Place should be included on the map as a pedestrian route.

No modification specified however it is indicated that there are challenges with the connection with H44 to the walkway (although the walkway is welcome)

Point i on page 63 is welcome but should be strengthened for ALL development by the river. Maintain a 20m buffer zone between the top of the bank to the Water of Leith and built form and use the buffer to create natural space for resilience and overland flow.

Leith Links Community Council (0617)

No modification specified however it is indicated the proposal should not be included in the Plan.

SEPA (0012)

It is indicated Place 9 should address the fact that a flood risk assessment is required as set out in Appendix D. A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

There may be flooding issues within/adjacent to this site which should be investigated further.

Inverdunning (Hatton Mains) Ltd (0427)

Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with “Places 9-14”

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

Site should be considered as potential windfall only with no commitment to housing.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Synergy Group Fitness (0806)

City Plan should clarify how housing land requirement can be met.

Living Streets Edinburgh Group (0486)

It should be made clear there is no scope to allow 'wiggle room' in the implementation of the statement in g by clarifying circumstances for very limited car parking.

Mark Ockendon (0419)

Place 9, requirement G: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

It is quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life) - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Jodi Duffin (0264)

No modification specified however it is indicated that the proposal should be deleted given the following grounds of objection are raised:

Katie Soane (0260)

It is indicated that fewer/smaller/lower properties should be proposed or the proposal should be deleted.

**H44: Newhaven Road 1**

Leith Central Community Council (0614)

Amend City Plan to more clearly label this proposal on maps.

SEPA (0012)

It is indicated that the Place policy should refer to the need for a flood risk assessment in line with Appendix D. The strategic FRA for the Water of Leith should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

There may be flooding issues within/adjacent to this site which should be investigated further.

Inverdunning (Hatton Mains) Ltd (0427)

Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with “Places 9-14”

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

Site should be considered as potential windfall only with no commitment to housing.

Living Streets Edinburgh Group (0486)

It should be made clear there is no scope to allow ‘wiggle room’ in the implementation of the statement in g by clarifying circumstances for very limited car parking.

Mark Ockendon (0419)

Place 10, requirement G: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Katie Soane (0260)

It is indicated that fewer/smaller/lower properties should be proposed or the proposal should be deleted.

**H45: Newhaven Road 2**

SEPA (0012)

It is indicated that the Place policy should refer to the need for a flood risk assessment in line with Appendix D. The strategic FRA for the Water of Leith should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

There may be flooding issues within/adjacent to this site which should be investigated further.

Living Streets Edinburgh Group (0486)

It should be made clear there is no scope to allow 'wiggle room' in the implementation of the statement in g by clarifying circumstances for very limited car parking.

Leith Central Community Council (0614)

City Plan should more clearly label this proposal on maps.

Developments along Water of Leith need to be accompanied by added public transport capacity and permeability on foot and by bike (in particular across and along the river).

City Plan should ensure this proposal must not overshadow the Water of Leith Walkway or existing residential buildings.

Inverdunning (Hatton Mains) Ltd (0427)

Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with "Places 9-14"

Site should be considered as potential windfall only with no commitment to housing.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (0736)

The proposed allocation should therefore not prejudice the estate from operating as an industrial estate in the short / medium term. This could include minor development within the estate to meet the needs of current or future tenants of the estate.

Principle a: Part 4, Table 2 give a density range of 100-175 dwellings per hectare. A density range of 125-200 dwellings per hectare is considered far more appropriate given the site's highly sustainable location and the density of some of the newer developments in the local area.

Principle b and c: Too specific as currently worded and would be better if combined into a single principle which deals with non-residential uses - "Provision of flexible non-residential floorspace (Class 1-4) as part of a mixed-use development. The scale and type of uses and associated floorspace to be informed by market and need assessments."

Principle g: Given the size of the site it is considered that there is an opportunity to include slightly taller elements than the surrounding context (up to 8 storeys) to provide variety within the local area and to act as wayfinding buildings linked to the new permeable network of streets and paths. The potential for taller elements should be written into the development principle – suggested rewording: "Vary height, mass and housing typology in response to diverse edge conditions that include built heritage and a range of residential heights (2 to 6 storeys). Use townscape, protected and local and view analysis to inform scale and massing. 'Potential for taller elements (up to 8 storeys) subject to justification'."

Principle i: The site is well located in terms of access to public open space with Pilrig Park, St Marks Park and Lethem park all located within a short walk. Any requirement to provide public open space on site is likely to have a detrimental impact on the viability and delivery of the site for housing.

Mark Ockendon (0419)

Place 11, requirement H: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Liane Montgomery (0030)

It is indicated this proposal should be deleted.

Katie Soane (0260)

It is indicated that fewer/smaller/lower properties should be proposed or the proposal should be deleted.

## **H46: Bangor Road**

Living Streets Edinburgh Group (0486)

It should be made clear there is no scope to allow 'wiggle room' in the implementation of the statement in g by clarifying circumstances for very limited car parking.

SEPA (0012)

Amend Place policy to state the requirement for a flood risk assessment is requested in line with Appendix D but not mentioned in Place policy. The strategic FRA for the Water of Leith model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site may be constrained due to flood risk and may not be suitable for residential development.

There may be flooding issues within/adjacent to this site which should be investigated further.

Mark Ockendon (0419)

Place 12, requirement F: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Inverdunning (Hatton Mains) Ltd (0427)

Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with “Places 9-14”

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

Site should be considered as potential windfall only with no commitment to housing.

Simon Thomson (0248)

It is indicated that the proposal should be deleted

Ali Hall (0072)

It is indicated that the proposal should be deleted.

**H47: South Fort Street**

SEPA (0012)

This proposal requires a flood risk assessment (FRA).

The strategic FRA for the Water of Leith model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

There may be flooding issues within/adjacent to this site and these should be investigated further.

Living Streets Edinburgh Group (0486)

It should be made clear there is no scope to allow ‘wiggle room’ in the implementation of the statement in g by clarifying circumstances for very limited car parking.

Mark Ockendon (0419)

Place 13, requirement F: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."



Inverdunning (Hatton Mains) Ltd (0427)

Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with “Places 9-14”

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

Site should be considered as potential windfall only with no commitment to housing.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

**H48: Stewartfield**

Rachel Ross (0784)

It is indicated this proposal should be deleted as the site should not be developed from a light industrial site to a housing-led mixed-use development.

Living Streets Edinburgh Group (0486)

It should be made clear there is no scope to allow ‘wiggle room’ in the implementation of the statement in g by clarifying circumstances for very limited car parking.

Mark Ockendon (0419)

Place 13, requirement F: "Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries." - remove, and replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

SEPA (0012)

It is indicated that the Place policy should include the requirement for a flood risk assessment in line with the requirement in Appendix D. The strategic FRA for the Water of Leith model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

There may be flooding issues within/adjacent to this site which should be investigated further.

Inverdunning (Hatton Mains) Ltd (0427)

Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with “Places 9-14”

Accept Place-based approach taken by City Plan 2030, but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.

Site should be considered as potential windfall only with no commitment to housing.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Gareth Hutchinson (0290)

It is indicated that City Plan should cancel permit parking proposals for the area.

David Williams (0643)

It is indicated this proposal should be deleted.

Jennifer Reaves (0299), Anne Meikle (0286), Sarah Farrell (0473)

It is indicated that the proposal should be deleted.

Liane Montgomery (0030)

It is indicated that the proposal should be deleted.

Gillian Rae (0571)

It is indicated that the proposal should be deleted.

Hew Dalrymple (0238)

It is indicated that the proposal should be deleted and/or the site should retain mixed use development allowing small business parks to remain.

Framework (Edinburgh) Limited (0743)

It is indicated the proposal should be deleted.

Katie Soane (0260)

It is indicated that fewer/smaller/lower properties should be proposed or that the proposal should be deleted.

Katrina Danson (0301)

It is indicated the proposal should be deleted.

**H49: Coruna Place**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

### **H50: Bonnington Road**

Christine Nurse (0323), Catherine Ness (0642)

It is indicated the proposal should be deleted. Instead there should be an effort to maintain and invest in the Bonnington estate and, rather than repurpose it as housing.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Sarah Roberts (0630)

It is indicated the proposal should be deleted.

Richard Cherns (0476)

It is indicated the proposal should be deleted.

Forth District Salmon Fishery Board - Crown Estate Scotland (0346)

It is indicated that this proposal should be amended so as to take sufficient consideration of accessibility of potential salmon fishing interests and provide a sufficient buffer zone to protect the water habitat from contaminants.

SEPA (0012)

It is indicated that the proposal may not require a flood risk assessment (FRA). The form of flood risk and its sources should, however, be clarified either in Appendix D for this site or in this housing proposal.

### **H51: Broughton Road**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

SEPA (0012)

City Plan should reconsider whether a Flood Risk Assessment is needed for this site as presently City Plan states this is not needed however SEPA does not hold enough evidence to support this.

The strategic FRA for the Water of Leith model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required.

There may be flooding issues within/adjacent to this site which should be investigated further.

**H52: Iona Street**

SEPA (0012)

There may be flooding issues within the site and this should be investigated further.

**H53: Albert Street**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Matthew Gason (0090)

It is indicated that the proposal should be deleted.

SEPA (0012)

There may be flooding issues within/adjacent to the site and this should be investigated further.

**H54: St. Clair Street**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### Simon Thomson (0248)

It is indicated that this proposal should be deleted as the sites are not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### SEPA (0012)

Flooding issues within/adjacent to this site should be investigated further.

It is indicated that the City Plan should consider the opportunity of this site to accommodate a strategic SUDS basin.

#### **H55: Seafield**

##### The Royal London Mutual Insurance Society Ltd (0149)

Object to the identification of their land holding at Seafield Way (Appendix 1) as being part of a 'major new development area' (map 1) and identified as an area for 'Housing Led Development' (map2). Have no intention of releasing the land for housing use over the Plan period and their land holding should not be considered for residential or urban area housing led mixed use.

Request removal of Royal London's land holding from 'major new development area' (map 1) and remove from area for 'Housing Led Development' (map2). Royal London's land holding should be identified as an 'employment centre' on map 1 and 'business and industry area' on map 2.

*[Outcomes - A city in which everyone lives in a home which they can afford]*

Remove Royal London's land holding at Seafield way from land designated a 'New housing led development' from map 7 (p27).

*[Proposals Map – NE]*

The proposals map identifies 'business and industry' areas. The areas should be extended to include Royal London's land holding at Seafield Way.

Remove provision for compulsory purchase from paragraphs 2.103 (p28) and 2.110 (p29).  
- CPOs entail lengthy and complex procedures. Further complicated when using it to acquire land used by operational businesses - where businesses are forced to close, the Council could be required to buy the whole businesses valued as a going concern - not just premises. As a publicly funded body the Council must have regard to obtaining best value for the money it does spend.

*[Outcomes - A city where everyone shares in its economic success]*

Map 10 page 36 - Identify Royal London's land holding at Seafield Way as land for business and industry. Refer to Appendix 1 for site boundary.

*[Place Policies -Place 15]*

Page 69: Remove Royal London's land holding at Seafield Way from Place 15.

Add new requirement in principle to Seafield Development Principles as follows, "design new housing to mitigate any significant adverse impacts on residential amenity from existing or new general industrial development"

[H55]

Part 4 Table 2 Page 161 - Amend number of housing units expected to be delivered from allocation due to removal of Royal London's land holding from Place 15 and related removal from maps 1,2 and 7.

Mark Ockendon (0419)

Place 15, requirement E, insert additional point: *"Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."*

David Thomson (0538)

It is indicated that this proposal should be deleted.

Scottish Water (0342)

It is indicated that City Plan should make clear that a site survey of the exact location of the assets and any mitigation protection measures identified would be highly advised before any land transactions take place and that, when planning new development in this area, odour risk, and proximity to Seafield WwTW (waste water treatment works) should be considered. This site is located approximately 50m from the boundary of Seafield WwTW. In addition to the proximity to the WwTW, there are a number of large strategic wastewater pipes intersecting this site that may require considerable measures to ensure they are protected from any impact of development.

Alastair Cameron (0145)

3.45 (p69): Amend the opening sentence as follows: The Council will establish a community-led body to prepare a place brief for the site.....

Add to final sentence .... and housing development should be low-rise with primacy given to providers of affordable homes, particularly those for affordable rent.

3.47 (p69): Add: the Seafield Development Principles will include design measures to link all development with the existing facilities on Portobello Promenade. The Principles will include small-scale business provision such as cafes, workshop and office space in addition to housing, health, education and community facilities. The underlying concept will be the '20-minute neighbourhood'.

Ursula Wright (0662)

It is indicated that this proposal should make provision for allotments.

Living Streets Edinburgh Group (0486)

It is indicated this proposal should be amended to make clear pedestrians have priority throughout and development designed accordingly and car parking must be limited with

contributions secured to enhance public transport and surrounding pedestrian infrastructure.

RSPB (0648)

Additional mitigation may be required such as screening and signage to reduce disturbance by dog walkers during winter.

Action Party (0250), Jennifer Elliot (0791), Anna Brand (0742), Gemma Sethsmith (0694), David Cooper (0735), Serge Marti (0745)

It is indicated that the City Plan should be amended so as to state:

1) Process the development at Seafield requires a stronger community steer:

- Place Brief: Establish a community-led body to prepare a Place Brief for the site. A Place Brief should have been developed in collaboration with the community to feed into the Seafield proposals in the City Plan.
- No development should take place until the Masterplan is produced
- No informal consultation between landowners/ developers and council/ planners should take place in parallel with the Place Brief or Master planning processes, or else it needs parallel input - or oversight - by all relevant community representatives.

2) Substance – Seafield requires a community-centred comprehensive holistic approach:

- Welcome a joined-up environmentally-sensitive, socially-inclusive community development at Seafield that creates a vibrant sister community.
- Oppose any process leading to a negative development

expect that a development that is responsive to the following 7 points:

- Housing that is climate resilient and responsive - inclusive and affordable new homes build to adequate thermal efficiency to allow for low/zero carbon heating.
- Transport: a design led approach.
- Community infrastructure: a new school and facilities centrally located, focussed on a neighbourhood centre and transportation hub.
- Green space: open community green spaces and recreational space
- Coast, nature and climate change: ensure net biodiversity gain
- Prom and beach: deliver a renewed and sustainable Seafield prom
- Integrated development: No development unless an overall Masterplan is approved by the wider community.

Specific modifications sought as follows:

3.46 Local communities and key stakeholders will be consulted through the development of the Place Brief. Once approved [INSERT: by the community and the council] the Place Brief will become non-statutory planning guidance. Proposals for any part of this site in advance of an approved Place Brief [INSERT: and Masterplan] will be considered as

premature in line with Policy Env 2. Proposals will also be assessed against the Seafield Development Principles and other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity. [INSERT: Any consultations between landowners/ developers and council/ planners during the Place Brief or Masterplanning processes should be transparent or be accompanied by parallel input - or oversight - by all relevant community reps.]

#### Development principles

- a. [INSERT: An inclusive and affordable community-led] housing mixed use urban extension with a sense of community that can connect with neighbouring areas and the wider city. [INSERT: A holistic community development that only proceeds if it includes the whole site (both south and north of Seafield Road) and if the overall Masterplan is approved by the wider community.]
  - b. Appropriate mass, scale, height and layout of new development, having regard to views to it from the Firth of Forth, [INSERT: with taller buildings on the inner (south) side of Seafield Rd and lower by sea]
  - c. Ensure all homes are adequately served by play facilities and have access to open space in line with the Council's Open Space Strategy and proposal BGN57. [INSERT: Instead of mass building of identikit private or social housing, ensure each home is built to meet specific peoples' needs (in the form of co-housing, small scale housing cooperatives, or a community organisation like Action Porty owning the land and people only owning the building so homes retain their affordability) Ensure Passivhaus standards, or adequate thermal efficiency to ensure low/zero carbon heating e.g. using waste heat from adjoining water treatment works.]
  - e. Provision of sustainable travel infrastructure, including where possible use of existing rail infrastructure [INSERT: such as by safeguarding the railway track so Portobello/ Seafield can link with the tramline at Leith])
  - e/b. Edinburgh Promenade upgrade and safe connections and safe crossing of Seafield Road East. [INSERT: Change the character/ traffic speeds of Seafield Road, by narrowing and by providing numerous crossing points to ensure connectivity for walking/wheeling]
  - e/f. Active Travel connections through Harry Lauder Junction. New public transport route: Seafield Road [INSERT: connecting] to Leith [INSERT: and Portobello, e.g. Portobello to Leith buses.]
  - e/h. Provide or contribute towards education, and healthcare infrastructure and community facilities. [INSERT: Build a new school and facilities centrally located on a neighbourhood centre and transportation hub; including GP surgery, small workspaces and small retail spaces to compliment local business rather than compete with it.]
- [INSERT: e/f. Open community green spaces and recreational space that faces the sea at the heart of the community, linking to Prom and diverse habitats. Ensure net biodiversity gain with a living seaside. Sea defences at Seafield should not exacerbate storm impacts on Portobello Beach.]
- [INSERT: e/g. Deliver a renewed and sustainable Seafield prom, e.g. a lower prom could provide for enhanced human and ecological connectivity, and include picnic tables, space for ad hoc sports; and an upper prom could be school, nursery, with pathways into the community with workspaces, cafes, temporary buildings, and a public square at Seafield intersecting with the Prom.]



## Proposed Changes:

Place 15:- Planning permission will be granted for development within the boundary of Seafield, as defined on the Proposal Map, *provided it accords with other local plan policies and does not prejudice wider development objectives for the Seafield area.*

3.46 Local communities and key stakeholders will be consulted through the development of the Place Brief. Once approved the Place Brief will become non-statutory planning guidance. Proposals for any part of this site *must not prejudice wider development objectives for the Seafield area.* Proposals will also be assessed against the Seafield Development Principles and other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity.

### Edinburgh Dog and Cat Home (0310)

Amend the boundary of site H55 (Seafield) to additionally include the EDCH site at Seafield Road East.

Amend H55 capacity to 950+ units

Amend third sentence of paragraph 3.46 (page 69) and amend to Table 2 H55 to: "Proposals for any part of this site in advance of an approved Place Brief will be considered as premature in line with Policy Env 2 *where it would compromise the comprehensive development of the Seafield development site.*"

Amend the Place 15 (Seafield) Development Principle (h) (page 69) to: "(h) Proposals will be expected to provide or contribute towards education, and healthcare infrastructure and community facilities including either upgrading the existing Edinburgh Dog and Cat Home or secure its relocation to a suitable new facility on an alternative site."

Add a principle in Place 16 that the current EDCH use should be retained either at its current site or elsewhere.

### Peter Allen (0336)

Future development at Seafield must provide education, and healthcare infrastructure and community facilities.

The community must lead on some of the housing development, so that the housing being provided is what the community actually want.

It is indicated that City plan should mention the sewage treatment works at Seafield.

### Anne Thomson (0551)

It is indicated there should be adequate parking for residents and beach-users, with an investment in a prom upgrade and leisure activity support required also.

Use of the railway should be considered. It could become a tram or express bus route.

NatureScot (0528)

Recommend that the requirements in principle of Place 15 are amended to include: "Proposals should demonstrate short-term resilience to coastal change and longer-term adaptation, avoiding the need for further coastal protection measures." . Recommend that the first requirement in principle is amended with the addition of: "A housing-led mixed use urban extension with a sense of community that connects with neighbouring areas and the wider city via multi-functional green blue networks and active travel routes."

Paragraph 3.52 (page 70) should be amended to: "The mitigation measures noted above would ensure development of the Seafield Industrial Estate would have no adverse effect on site integrity of the Firth of Forth SPA and the Outer Firth of Forth and St Andrews Bay Complex SPA"

Miller Homes (0256)

It is indicated that H55 should be deleted and alternative solutions to development at Place 15 – Seafield, should be considered including the inclusion of greenfield sites which have a lower potential for adverse impacts on European sites, including Riccarton Village.

Julie Robertson (0210)

It is indicated that this proposal should not involve removing existing businesses.

Arnold Clark Automobiles Ltd (0750)

It is indicated that City Plan should state that the Council undertake the studies in Appendix D in early course to inform the upcoming masterplanning exercise.

Portobello Amenity Society (0612), Stephen Ian Hawking (0469)

It is indicated that City Plan should require an imaginative enforceable Masterplan and Place Brief that is thoroughly consulted on and demonstrably has the support of the surrounding communities.

Suzanne McIntosh (0409)

City Plan should state that the following infrastructure required in relation to H55: a new primary school, an extension to the high school, a new medical surgery, good cycle infrastructure, public transport, the Edinburgh suburban rail line - a station at Seafield and a potential future tram extension could be planned for as part of this major expansion.

Oonagh O'Brien (0585)

Request the following changes:

- Add to the proposal for an inclusive and affordable community-led housing mixed with a sense of community that can connect with neighbouring areas and the wider city the concept of 'a holistic community development that only proceeds if it includes the whole site (both south and north of Seafield Road) and if the overall Masterplan is approved by the wider community.'

- Appropriate mass, scale, height and layout of new development, having regard to views to it from the Firth of Forth, with taller buildings on the inner (south) side of Seafield Rd and lower by sea
- Instead of mass building of identikit private or social housing, ensure each home is built to meet specific peoples' needs (in the form of co-housing, small scale housing cooperatives, or a community organisation like Action Porty owning the land and people only owning the building so homes retain their affordability)
- Deliver a SUDS solution to serve both the site and surrounding area in line with Proposal BGN9
- Safeguard the railway track so Portobello/ Seafield can link with the tramline at Leith to help expand sustainable travel infrastructure: improve active travel in the area in line with community responses submitted to this plan.

Diana Cairns (0452)

It is indicated that development design must be community-led.

Lawrence Marshall (0702)

It is essential that any tall buildings planned be placed at the southern edge of the available land for redevelopment.

Consideration should be given to relocating Seafield Road East to the south of the site to run alongside the railway line to Leith Docks.

Lothian Buses should be encouraged to look at the Edinburgh Coach and Truck Park off the Sir Harry Lauder Road as an alternative site for their Marine Depot.

The railway line to Leith has the potential to provide a green public transport link for the area. In particular, provision should be safeguarded in the area east and west of Bath Road to allow this line to link up with the tram line at the northern end of Constitution Street.

The NWH Group have their depot on Albert Road. An investigation should be launched into seeing how much of the traffic they generate can be moved by rail instead.

Inverdunning (Hatton Mains) Ltd (0427)

Site capacity should be reduced. A development brief for wider redevelopment can be provided but only part should form an allocation if supported by Lothian Buses.

SEPA (0012)

An FRA is required which assesses the coastal flood risk to the site.

Portobello Community Council (0206)

It should be clarified that any development in advance of full production of the Place Brief, FRA and erosion appraisal, development principles, masterplan should be considered premature.

### **H56: Sir Harry Lauder Road**

Portobello Community Council (0206)

The proposal must provide clarity to the proposed scale and preferred location of the class 4/ commercial.

Reference should also be made to the need to provide landscaped streetscape and active travel connectivity.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

SEPA (0012)

. An FRA which assesses the Figgate Burn is needed. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site which should be investigated further and it is recommended that contact is made with the flood prevention officer.

### **H57: Joppa Road**

Mary Burgess (0456), Beverley Burgess (0605), Kim McFarlane (0698),  
Oonagh O'Brien (0585), Morgan Smith (0788), John Gerard Holligan (0412),  
Bridget Campbell (0706), Corrie Fairweather-Mills (0527)

No modification specified however it is indicated that this proposal should be deleted or it's scale significantly reduced in terms of height and density.

Craig McIntyre (0709), Nadia McIntyre (0704)

No modification specified however it is indicated that this proposal should be deleted

Portobello Community Council (0206)

Development on this site should be carefully handled and guided by clear site requirements.

Additional reference should be added to reflect the need for built form to relate to the setting and scale of neighbouring buildings in the Conservation Area.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

SEPA (0012)

There may be flooding issues within/adjacent to the site which should be investigated further and it is recommended that contact is made with the flood prevention officer.

#### **H58: Eastfield**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal.

Simon Thomson (0248)

It is indicated that this proposal should be deleted.

Portobello Community Council (0206)

The development principles for the site should state that:

The set back from the Brunstane Burn must also state that public access should be facilitated in this safeguarded space through the provision of a path which connects from Eastfield/ Edinburgh Road to the coast and linking to the proposed Active Travel path ATSG21.

Existing trees on the roadside edge should be retained or reconfigured as a landscape frontage to be retained or reconfigured.

SEPA (0012)

The site should be considered for removal. The site will likely be constrained due to flood risk.

The FRA required for this proposal must assesses the risk from the Brunstane Burn, coastal flood risk, and the interaction between the two sources of flood risk.

The surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site and this should be investigated further.

#### **Summary of responses (including reasons) by planning authority:**

#### **Various North and East Proposed Sites**

Suzanne Bruce (0565), Howard Jones (0424)

The proposals in this area are not considered to result in overpopulating this area for the following reasons:

The cumulative effects of new housing proposals in relation to infrastructure capacity in relation to GP Practices are addressed in Issue 27, Education in Issue 29 and transport/associated pollution in Issue 31. The individual and cumulative impacts of proposals in this area would be acceptable with the required mitigation. Policy Inf 1 'Infrastructure Delivery' applies. Policies ENV 35 and 36 require no detrimental impact from a proposal in terms of flood risk, drainage and mitigation see Issue 16). There is no evidence that the proposals would have detrimental impacts in terms of tourism or students.

Open space provision (including publicly accessible greenspace) is monitored and analysed through the Council's Open Space Audit (CD067) and Open Space Strategy (CD066) respectively. **No modification proposed.**

#### **Place 4 - Edinburgh Waterfront**

##### SEPA (0012)

The Council considers the development management process is the most appropriate process for how flood risk can inform design and layout given proposals are only set out in high level terms in City Plan. The reference to Flood Risk Appraisals in relation to three sites is not significantly different to Flood Risk Assessment in meaning when read in context as this still makes clear flood risk needs to be considered in respect of informing the design and layout. **No modification proposed.**

##### RSPB (0648)

The final sentence of paragraph 3.24 states that the 'in-combination effect' of applications still needs to be considered as they come forward. **No modification proposed.**

##### LPBZ Commercial Ltd (0391).

The proposal does involve areas of non-residential use and so mixed-use regeneration is considered appropriate. This can apply where residential is the main or predominant use.

The car park element of t2 Ocean Drive is within the overall allocation. The Council does not agree this part of the site should be identified for a particular use on Map 15. Development of the site for a particular proposal can be considered through the development management process. The Council is satisfied the City Plan policies and proposals provide for assessment. Map 15 provides additional information but is only one part of the overall context and the development plan is to be read a whole.

The Council considers the employment uses policies and allocations, including re-provision on site in appropriate instances, with Place Policy 4 provides sufficient scope for accommodating commercial uses. This includes directing office provision to the Strategic Business Centre in this area. The Council does not accept it is necessary to expand the boundaries of this and that it is adequate as proposed to meet need and demand in this regard as set out in Issue 37 and Issue 2 addresses the requirement for offices as part of the Spatial Strategy. Issue 35 addressing Economy policies specifically. **No modification proposed.**

#### Forth Ports Limited (0496)

Paragraph 3.19 states that in order to provide a flexible context for renewable industry-related developments, this LDP does not set detailed layout or design principles. As such the Council does not agree that City Plan prejudices development of the docks in this respect.

Footpath and cycle connections indicated on maps 14 to 17 and referred to in development principles are indicative. They do not override issues of land ownership in respect of the Port Estate. It is not necessary to state this explicitly in the LDP given it is an established matter of law.

Criterion c is considered to remain appropriate as proposed given the circumstances for the safeguard remain applicable.

The modifications sought in relation to Britannia Quay and the Port of Leith Area with Potential for Change are addressed in Issue 37 – Economy Proposals. **No modification proposed.**

#### National Galleries of Scotland (0725)

It is noted that various caveats are suggested to the criterion under Place Policy 4. However, it is not considered that these are necessary to improve clarity and will be clear when applied to proposals coming forward. The split of criterion 'g' is not required as clarity is shown in the accompanying map.

Map 19 provides an illustration with labels to the different parts of the overall Granton area. This provides clarity on the uses and different forms of development that should come forward, including that 'The Link' area offers opportunities for cultural uses. As such no new criterion i) is needed as sought in the modification.

The Council notes that references to the 'National Collections Facility' and 'Art Works, Granton' terminology could be made clearer. Should the Reporter be so minded these could be amended to provide clarity.

#### Sapphire Land (0247)

City Plan should be read as whole. The Council considers that appropriate provision is already made – including in subject policies – to ensure there is an appropriate mix of housing types, densities and sizes, and supporting ancillary uses. **No modification proposed.**

#### Crosslane Co-Living SPV2 Limited (0687)

The Council does not agree this part of the site should be identified for a particular use on Map 15. Development of the site for a particular proposal can be considered through the development management process. The Council is satisfied the City Plan policies and proposals provide for assessment. Map 15 provides additional information but is only one part of the overall context and the development plan is to be read a whole. **No modification proposed.**

Network Rail (0071)

Land ownership and operational safety issues are subject to separate legislative considerations and are not matters for the development plan in respect of the exact location of the Waste Management /Combined Heat and Power Safeguard. See Issue 31 in relation to Proposal R1. **No modification proposed.**

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), LPBZ Commercial Ltd (0391)

The Council acknowledges the lack of map keys in various maps is a technical error and should be corrected as a minor drafting/technical matter.

Union Property Services/VRS Ltd (0584)

The Council is content that the combination of Place Policy 4 and the subject policy framework in City Plan (including Policy Env 26 (Housing Density) addresses density potential. **No modification proposed.**

Living Streets Edinburgh Group (0486)

Modification of criterion g is not needed given the provision of criterion c of policy Env 26 which addresses this for any relevant development. **No modification proposed.**

Cockburn Association (0777)

The Council considers the maximising of development potential, in accordance with policies is reasonable and in line with the second stated Aim of City Plan on page 8.

The Council is content that proposal BGN 24 adequately address the broad scope for the Granton Waterfront Coastal Park. The small-scale class 1-4 uses, pavilion buildings and focal building are intended to help promote additional activity as part of the park rather than take patronage from existing businesses. **No modification proposed.**

Cockburn Association (0777), Dave Berry (0463)

Sea level rise is addressed in policy Env 34 (with reference to erosion) and Env 35 (with reference to flood risk) as relevant to this allocation and do not need duplication as development principles. **No modification proposed.**

HCPII Properties 101LP (0517)

The Plan must be read as a whole. As such the Council is content that an adequate balance is given between guiding development and providing flexibility in respect of the Central Leith Waterfront area. Issue 2 considers requirements for offices as part of the Spatial Strategy. Issue 35 addresses Economy policies including Econ 6 Hotel Development. **No modification proposed.**

SEPA (0012)



Policies Env 34, Env 35 and Env 36 set out how various issues relating to the water environment (including erosion, flood risk and surface water management) should be considered and how proposals should accommodate these in their layout and design. This includes consideration of culverted watercourses.

The integration of green blue infrastructure with active travel, 20 minute neighbourhoods, biodiversity, net zero and inclusivity are addressed in Issues 16, 2, 15, 13 and 11 respectively.

The framework for existing and proposed development is set out in Map 19. The intention is to provide separation of development from the shoreline where appropriate. The Council considers the extent of this shown is appropriate.

The Strategic Flood Risk Assessment (CD011). for Granton Harbour is to inform the development proposals at this location rather than more widely (Coastal Granton for example already having given consideration to flood risk). It may be appropriate for the scoping of the Harbour FRA to consider the surrounding area. **No modification proposed.**

Leith Harbour and Newhaven Community Council (0776), Hilary Hines (0265)

The merits of specific planning decisions are not material to the proposed plan. It sets the strategy, policies and allocations for future development.

Criterion c) of the Central Leith Waterfront allow for addressing any open space deficiency. How and where open space will be provided will relate to the nature and size of sites that come forward. Policies Env 31 and Env 32 set out how new open space in developments should be provided.

Place policies do not require to general additional levels of community support. The Plan Policies address the need for high quality development (see Issue 11: Design and Placemaking).

Matters regarding built heritage, air quality, amenity, scale of development, the effect on certain views from new development, and impact existing business are addressed in Part 3 of the plan. Flood risk is addressed in Policy Env 35, including how new development must be cognisant of existing development.

Policy Env 21 shall apply to any application that comes forward and protects the designated site Imperial Dock Loch which supports the Tern colony.

The Council considers that the principle of a waterside path is reasonable given uses existing and proposed for the Central Leith Waterfront area. Public footway exists along much of the shoreline already in this area. Detailed design and exact delivery of this route would be established in subsequent detailed proposals. **No modification proposed.**

Celia Mainland (0447)

The Council considers there is a significant level of provision made for green and open space in this Place Policy and consideration of policies Env 31 and 32 on new open space provision. Coastal Granton is a significant Green Blue Network proposal in this area.

The extension of Conservation Areas is a separate legislative process to the preparation of the local development plan. **No modification proposed.**

Henry Sandercock (0044), Celia Mainland (0447)

EW1a – Western Harbour: The proposal is a continuation from LDP 2016 (CD039). though it is acknowledged that the nature of the ponds on site have progressed in that time. Detailed assessment of the ecological and environmental merit of the ponds has not been undertaken. However, the Council recognises the ponds could comprise a feature of merit.

The diagrammatic maps featured in the Place Policy section (including map 14) are high level and so do not show the full extent of features to be retained and provided, including in relation to open space to be provided as noted in paragraph 3.154.

Any application coming forward would need to consider subject policies in addition to this Place Policy. This includes policies such as Env 3 'Development Design - Incorporating and Enhancing Existing and Potential Features', Env 6 'Green Blue Infrastructure', Env 21 'Protection of Biodiversity' and Env 37 'Designing-in Positive effects for Biodiversity' which require assessment and retention of existing features as part of new developments.

No modification proposed, however, should the Reporter be so minded a development principle could clarify the need for further assessment of the ponds.

Mark Ockendon (0419)

This is addressed through policies applicable to any proposed development, particularly in relation to design, density and building heights. **No modification proposed.**

NatureScot (0528)

Large parts of the area of Place Policy 4 have already been masterplanned and addressed through the Granton Waterfront Development Framework (CD081) and as such it would not be appropriate to repeat this. The Council considers it appropriate that future plans should be cognisant of existing Masterplans Policy Env 2 (Co-ordinated Development) will ensure the creation of a cohesive, connected place.

It is noted that the words "prior to consent" would add clarity to final mitigation measure following paragraph 3.24 (page 50) and similarly that reference to flood prevention should be either removed from the principle a) or further clarified, should the reporter be so minded.

No modification proposed in this regard, however, should the Reporter be so minded the addition to development principle (a) and amending the term 'significant effect' to read "no adverse effect on site integrity" would improve clarity.

Jayne Thurlow (0037)

**EW1a Leith Waterfront (Western Harbour):** The principle of the development of this greenspace is already established in the Adopted LDP. Properties in this area will be served by a park immediately to the south (BGN 44). Issues relating to any loss of light will

be addressed as part of detailed design. The impact on non-protected views and those from private properties are not material planning considerations. Construction impacts are matters not addressed in detail as part of the LDP process, with other processes in place to ensure construction impacts are not excessive in terms of amenity and disruption. **No modification proposed.**

Asda Stores Limited (0142)

Issue 38 'Retail and Leisure' considers this matter. **No modification proposed.**

SEPA (0012)

**EW1a-** Leith Western Harbour: Criterion g) requires a Flood Risk Assessment to be undertaken and that this should inform the design and layout of development proposals. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Andrew John Parnell and Brigitta Marianne Sjoberg Parnell (0344)

EW2b – Central Development Area: ForthQuarter Park includes areas which are publicly accessible, however development Principle a) of the ForthQuarter Park recognises that Caroline Park House is a private residence. The proposal does not state that public access to the private grounds is to be introduced or sought.

The definition of open space in the Glossary does not imply public access and is in line with the definition set out in PAN 65 (Planning and Open Space) (CD122).

The Council is otherwise content that the extent of area shown as green open space meets the definition of open space.

No modification is proposed, however, should the Reporter consider it necessary to give greater clarity with the following amendments the Council would not have issue with these:

- removing the building referred to as Royston House from the open space area.
- Amending the proposals map to align with Map 19 as the Proposals map shows the proposal extending further east than it should.
- Amend development principles to clarify that the reference to Caroline Park House is inclusive of Royston House.

SEPA (0012)

EW1b Central Development Area: Criterion e) requires a Flood Risk Assessment to be undertaken.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance

(CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Hilary Hines (0265)

Criterion b) of the EW1c East of Salamander Place development principles will assist in addressing issues relating to any open space deficiency. How and where open space will be provided will depend on the nature and size of sites that come forward. Policies Env 31 and Env 32 relate to the provision of new open space in developments and ensure that open space proportionate to the size of developments coming forward should be delivered. **No modification proposed.**

SEPA (0012)

EW1c East of Salamander Place: Criterion e) requires a Flood Risk Assessment to be undertaken.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

SEPA (0012)

EW2a: Forth Quarter: Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water).

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

SEPA (0012)

EW2b Central Development Area: Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Hilary Hines (0265)

EW2b Central Development Area: Open Space is required at the centre of this development area and ensures adequate provision. Density levels are appropriate to the surrounding area. **No modification proposed.**

Sapphire Land (0247)

The Council is required to provide proposed capacities at this stage. Policy Env 26 (Housing Density) states developments should deliver housing 'in line' with figures in Table 2. The Council considers this wording is appropriate. It may be there is some scope for variance from the specific figure of 1546 for **EW2c Granton Harbour**, however the extent of deviation from the housing figures set out in Table 2 is a matter of judgement for the decision maker determining subsequent planning application(s).. **No modification proposed.**

SEPA (0012)

**EW2c Granton Harbour:** Criterion g) requires a Flood Risk Assessment to be undertaken. The Council considers it is for the development management process to establish the scope and detailed matters for FRAs.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Biffa (0804)

EW2d: North Shore - Spatial Strategy considerations are set out in Issue 2.Issue 3 addresses the delivery of Spatial Strategy, including how it affects existing businesses. For this site the principle of a transition away from an industrial estate focus has been established through the approved master plan, as set out in the Adopted LDP (CD039). **No modification proposed.**

Hilary Hines (0265)

EW2d: North Shore is required to provide open space as part of the overall development. Map 20 shows areas expected to meet this need, although further areas of open space will be provided. The nature, size and location will depend on the nature and size of development sites that come forward. Policies Env 31 and Env 32 relate to the provision of new open space in developments and ensure that open space proportionate to the size of developments coming forward should be delivered.

The density of development proposed for EW2d: North Shore is considered reasonable and is cognisant of the Granton Harbour approved masterplan. **No modification proposed.**

SEPA (0012)

EW2d North Shore (referred to as West Shore within Place Policy 4): No modification is proposed, however, an amendment for clarity stating that a flood risk assessment is required for this site in line with the equivalent development principles for EW2d North Shore in the Adopted LDP (CD039) could be added for consistency should the Reporter be so minded.

The it is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water).

### **H29: Silverlea**

#### SEPA (0012)

Based on the comments submitted (i.e. referring to the Brunstane Burn/Niddrie Burn) the Council believes this comment was meant to be made in relation to site HSG 29 rather than H29. As a result this comment is dealt with in Issue 8: Proposed Sites South-East Edinburgh.

### **H30: Ferry Road**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2, with Issue 3 addressing its delivery, including the matter of the effect on existing business. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### The Salvation Army (0189)

Appendix D sets out the text sought in this representation already. **No modification proposed.**

It is noted that the following representation(s) were submitted in support of the proposal:

#### SEPA (0012)

SEPA agree with Proposed Plan Appendix D. No flood risk assessment (FRA) is required.

### **H31: Royal Victoria Hospital**

Ian McRae (0028), Jacqueline Christie (0023), Sheila Strathdee (0448),  
Christopher Fraser (0371), Elizabeth Morton (0772), Howard Jones (0424), Ian R N  
Stewart (0131)

The impact of this proposal alongside others in this plan has been through appraisals to consider the impact on key infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A strategic appraisal of Flood risk (CD011), including surface water flood risk, has also been undertaken. The impacts are considered acceptable, subject to appropriate mitigation which City Plan makes provision for – particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts and their assessment.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides the appropriate framework for consideration of flood risk, addressed in Policies Env 35 'Reducing Flood Risk' and Env 36 'Designing for Surface Water'. **No modification proposed.**

Christopher Fraser (0371)

Assessment of the site's access to recreation (play facilities and open space) is provided in the Council's Adopted Open Space Strategy (CD066). It is noted here that, in addition to having to provide open space within the site, proposal BGN 36 requires the site to deliver play facilities to ensure adequate provision of this form of recreation as necessary. **No modification proposed.**

Craigleith/Blackhall Community Council (0403), Sheila Strathdee (0448), Victoria Hart (0191), Naomi Appleton (0271), Dr Liam Keegan (0389), Elizabeth Morton (0772), Howard Jones (0424), Ian R N Stewart (0131)

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides the appropriate framework for consideration of existing biodiversity and amenity which are addressed in Policies Env 21 'Protection of Biodiversity' and Env 33 'Amenity'. Various design policies are potentially applicable to issues of scale and visual impact of development, including Env 1 'Design Quality and Context', Env 25 'Layout Design' and 26 'Housing Density'. **No modification proposed.**

Naomi Appleton (0271), Dr Liam Keegan (0389)

Matters relating to increased driveways are more appropriately addressed in general terms rather than in relation to individual proposals. Issue 11: Design and Placemaking addresses this. **No modification proposed.**

Jacqueline Christie (0023), Ian McRae (0028), Susie Ross (0440), Sheila Strathdee (0448), Ian R N Stewart (0131)

The Council has considered different options for providing additional capacity needed in relation to the Flora Stevenson school and catchment. The provision of an annexe as part of H32 Crewe Road South is considered the most appropriate. Issue 29: Education considers education matters, including in relation to the matter of new Flora Stevenson and Gaelic school provision. **No modification proposed.**

Jacqueline Christie (0023), Sheila Strathdee (0448), Victoria Hart (0191), Ian R N Stewart (0131)

Proposal BGN 22 makes specific provision for how this proposal shall retain and provide blue green infrastructure as well as certain built features such as walls. Further information also provided on Map 21. The proposal is to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan in this regard provides the appropriate framework for consideration of existing biodiversity, addressed as part of Policy Env 21 'Protection of Biodiversity'. Policy Env 3 sets out policy requirements in respect of retention of existing

built and natural features. Policy Env 32 sets out requirements for communal open space and private gardens in housing developments. Policies Env 9 and Env 10 are relevant when considering Listed Buildings, in particular how/if they should be incorporated into the proposal, especially if this is not specified in the development principles themselves. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248), Ian R N Stewart (0131)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. The site is still considered as potentially available for development as set out in City Plan given it is only one of a number of options which are being considered for a Gaelic secondary school. It is considered important that good design principles inform the development of the site whichever uses are developed

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses delivery of the Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan **No modification proposed.**

Susan Burney (0360), Lesley Moyes (0703), Naomi Appleton (0271),  
Dr Liam Keegan (0389), Helen Mitchell (0484)

Development principle b) makes clear that the scale of retail and Class 2/3 uses is to be proportionate to the needs of future residents rather than seeking to provide for a wider area **No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in this respect (see paragraph 46.)

The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**



Howard Jones (0424), Ian R N Stewart (0131)

It is for NHS Lothian to judge as to what and where there is a need for hospital provision in this area. The Council understands this site is not needed for such a purpose. **No modification proposed.**

SEPA (0012)

Issues of surface water flooding within and adjacent to the site will require to be addressed in terms of Policy Env 36 (Designing for Surface Water). Criterion g sets out how the surrounding context should be considered however the development management process has scope to consider further factors and matters or process raised in this representation. **No modification proposed.**

Elizabeth M Kungu (0063)

The Council considers the requirements of BGN 22 are clear and there is no indication in the proposal wording that these could be 'watered down' at a later stage. **No modification proposed.**

Ian R N Stewart (0131)

Bats are a protected species, and a bat survey would be required as part of any planning application. **No modification proposed.**

Iain R N Stewart (0131)

The Council acknowledges the site contains areas of greenery. This is not downplayed, but equally it does not preclude some development of the site provided the features of merit are sensitively addressed and retained. The development principles for the site, for example h, as well as Map 21 and BGN proposal 22 all recognise the value of greenspace on the site.

Many of the comments raised appear to be specifically about this site so it is not possible to apply them to H33/H34 as requested. Comments relating to flood risk and education are able to be understood in a wider context, however the Council's consideration and response would be the same for H33 and H34 as they are for this site.

Development principle g and the link to Craigleith Hill Crescent relate to an active travel link. The alternative access noted in representation to the west of the site is vehicular and joins Craigleith Road. It is positive for the site to have an additional access onto a different road and serving non-car traffic.

Policy Env 21 'Protection of Biodiversity' addresses protected species such as bats, with appendix D setting out that a Protected Species Survey is required for this site. The Council cannot comment further on what the potential presence of bats may mean without the relevant survey(s) being undertaken and having regard for the potential need for a licensing process to follow. **No modification proposed.**

**H32: Crewe Road South**

Police Scotland / Scottish Police Authority (0659)

Support for principle of development noted.

The amount of greenspace proposed is considered appropriate given its importance for a range of functions and particularly in its importance for setting.

On the 'appropriateness of the development areas proposed' and based on the modification sought, the Council considers the plan should not set out this level of detail, The height and design of built form should be informed by a townscape and visual impact assessment given the sensitivity of the area and role of the site within it as part of the planning application.

The Council has given careful consideration to the capacity of this site, including the extent of developable area, the visual sensitivity, and that part of the site is needed for the school annexe (see Issue 29: Education). Further work on environmental factors following the Choices for City Plan MIR stage led to the estimated capacity figure being reduced.

In a review of accessibility it was found that this site was more accessible by means other than private car compared to the Royal Victoria Hospital site. As a result the level of private parking provision is lower.

Should the Reporter see merit, amending the unlettered development principle (plan page 57) for an open river channel to make clear that proposals should be informed by flood-risk and surface water management assessment work would improve clarity.

Ian McRae (0028), Sheila Strathdee (0448), Deidrie Brock MP (0801), Jacqueline Christie (0023), Helen MacLeod (0364), Howard Jones (0424), Naomi Appleton (0271), Iain R N Stewart (0131), Susie Ross (0440)

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provisions of the plan provides for consideration of flood risk through Policies Env 35 'Reducing Flood Risk' and Env 36 'Designing for Surface Water'. Issues of Biodiversity are addressed by Policy Env 21. Policy Env 3 sets out policy requirements for retention of existing built and natural features. Policy Env 32 sets out requirements for communal open space and private gardens in housing developments, including the quality and nature of space required. Policy Env 6 sets out expectations on the nature and standard of green infrastructure. Policies Env 9 and 11 consider the effect of new development in terms of visual impact on heritage assets, including in relation to the New Town World Heritage Site.

The Council has considered different options for providing additional capacity needed in relation to the Flora Stevenson school and catchment. The provision of an annexe as part

of H32 Crewe Road South is considered the most appropriate. Issue 29: Education considers education matters, including in relation to the matter of new Flora Stevenson and Gaelic school provision. **No modification proposed.**

Shiela Young (0251)

The Council is content that the development principles with Policy Env 35 (Reducing Flood Risk) addresses how the proposal should handle culverts and potential culverts on /adjacent to the site.

Development principles a) and d) address mixed use, with the school annexe addressed in criterion e). Healthcare needs are addressed above. **No modification proposed.**

Sheila Strathdee (0448), Helen MacLeod (0364), Iain R N Stewart (0131), Susie Ross (0440)

The Council has considered different options for providing additional capacity needed in relation to the Flora Stevenson school and catchment. The provision of an annexe as part of H32 Crewe Road South is considered the most appropriate. See Issue 29: Education for further information on this, including in relation to the matter of new Flora Stevenson and Gaelic school provision

Details in relation to nature/design of the school annexe and environs will be considered through the development management process. **No modification proposed.**

NHS Lothian (0596)

The Council considers further clarification unnecessary the Western General Hospital Place Brief (CD080) is made available on the Council's website. **No modification proposed.**

Susie Ross (0440)

It is for NHS Lothian to assess any need for medical facilities in this area. The Council understands this site is not needed for such a purpose. **No modification proposed.**

SEPA (0012)

The Council considers the Place policy and wording of Policy Env 35 addresses how culverts and potential culverts should be addressed.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in

this respect (see paragraph 46.) The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

Craigleith/Blackhall Community Council (0403)

The Council can only reasonably make requirements a developer can reasonably provide them. The proposed modification would not meet this test. **No modification proposed.**

Susie Ross (0440)

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provisions of the Plan provides for biodiversity as part of Policy Env 21 'Protection of Biodiversity'. Policies Env 35 and Env 36 set out the position in relation to surface water, including the combined sewer network. In terms of wastewater, Scottish Water has been consulted and has not objected to the site. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question.

**No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248), Iain R N Stewart (0131)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Susan Burney (0360)

Criterion d does not specify that uses have to be shops. The most appropriate use for the site would be established as part of more detailed proposals. **No modification proposed.**

Cockburn Association (0777)

The development principles are to be read as part of the Plan as a whole, including policies relating to these issues. The Council is satisfied that the net provision made provides for tree retention in Policies Env 20 (Protection of Trees and Woodlands). Env 6

(Blue Green Infrastructure), Env 27 (Public Realm, New Planting and Landscape Design). In terms of existing hardstanding areas, the Council notes these are of little merit and could be put to more beneficial use. Again, the Plan should be read as a whole in this regard – with Map 21 also of relevance.

The Council considers that development principle k. already has the effect of ensuring a TVIA is undertaken prior an application as it states that this TVIA must inform the proposal. **No modification proposed.**

Elizabeth M Kungu (0063), Andrew Brown (0007)

The Council considers the requirements of BGN 20 are clear and there is no indication in the proposal wording that these could be ‘watered down’ at a later stage.

The Strategic Flood Risk Assessment (CD011) did consider this site in the context of flood risk in this area. It did not look at whether existing areas of development are at flood risk as these are not proposed to be developed in City Plan. In terms of impact of this development on neighbouring areas and properties Policy Env 35 is clear that developments (which would include this) should not have such an impact. **No modification proposed.**

Christopher Fraser (0371)

An assessment of the site’s access to recreation (play facilities and open space) is provided in the Council’s Adopted Open Space Strategy (CD066) and associated Open Space Audit (CD067). Notwithstanding this, Map 21 and proposal BGN 20 set out substantial levels of greenspace and blue and green infrastructure as part of this proposal. **No modification proposed.**

Elizabeth M Kungu (0063).

Policy Hou 2 addresses affordable housing requirements, see Issue 23

Policy Env 26 (Housing Density) sets out that developments should deliver housing in line with capacities set out in the Plan. Planning applications may be submitted with numbers that vary from these figures. If so it will be for the decision maker to assess this. **No modification proposed.**

Royal Mail Group (0501)

Whilst the Royal Mail Group may need their existing sites for current business requirements, those requirements may change over the life-time of the plan.

The Crewe Road South site encompasses a number of uses and requires coordinated planning. Inclusion of the Royal Mail’s site within this proposal ensures that retention or redevelopment of the site can be considered in a comprehensive manner.

The Agent of Change principle puts the onus on developers of new, noise-sensitive properties to effectively deal with potentially problematic noise. **No modification proposed.**

Iain R N Stewart (0131)

The proposal wording sets out the principle of residential led use on the site is acceptable. Planning permission still requires assessment against City Plan as a whole and other material considerations however.

Some of the uses mentioned in the representation such as recreational open space should be contained in the site. Other uses, such as allotments, may also be able to be accommodated however this is a matter of detailed design but there would be support in principle for some of these within the overall City Plan framework. The relocation of electricity substations and gas District Governor is also a detailed design matter, as is the form of the river channel which must ensure it is safe.

The Council acknowledges the site contains areas of greenery. This is not downplayed, but equally it does not preclude some development of the site provided the features of merit are sensitively addressed and retained. The development principles for the site, for example h, as well as Map 21 and BGN proposal 22 all recognise the value of greenspace on the site.

Development principle g and the link to Craigleith Hill Crescent relate to an active travel link. The alternative access noted in representation to the west of the site is vehicular and joins Craigleith Road. It is positive for the site to have an additional access onto a different road and serving non-car traffic.

Works to the culvert under Crewe Road South are not addressed as part of this Place Policy. Amongst other matters it is noted there is not the same scope to incorporate a daylighted watercourse as there is along the north of the site.

The creation of a "strong urban form" on the corner of Comely Bank Rd and Crewe Rd has had regard for the context of the area, including its townscape. Notwithstanding this, detailed appraisals shall be required to support any planning application and how these have been taken into account in the detailed design proposals for the site.

Policy Env 21 'Protection of Biodiversity' addresses protected species such as bats and curlews, with appendix D setting out that a Preliminary Ecological Appraisal may be required for this site. The Council cannot comment further on what the presence of these species may mean without the relevant survey(s) being undertaken and having regard for the potential need for a licensing process to follow. **No modification proposed.**

David Brownlee (0120), Antonio Alonzi (0270), Helen Mitchell (0484)

The representations above are supportive of the Proposal as proposed.

### **H33: Orchard Brae Avenue**

Elizabeth M Kungu (0063)

Policy Hou 2 addresses affordable housing requirements, see Issue 23.

Policy Env 26 (Housing Density) sets out that developments should deliver housing in line with capacities set out in the Plan. Planning applications may be submitted with numbers

that vary from these figures. If so it will be for the decision maker to assess this. **No modification proposed.**

Susanna Sharp (0638)

The development principles are to be read as part of the Plan as a whole. This includes policies relating to the protection and provision of trees, particularly Env 20 (Protection of Trees and Woodlands), Env 6 (Blue Green Infrastructure) and Env 27 (Public Realm, New Planting and Landscape Design). These policies address the issues raised without the need for additional site specific provisions. Impact on amenity of neighbouring properties is addressed in policy Env 33. Policy Env 30 relates to Building Heights.

The impact of this proposal alongside others in this plan has been assessed as part of a Transport Appraisal which found the impact of the proposals to be acceptable subject to appropriate mitigation. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process.

As this proposal and H34 are separate and may come forward from different developers and land interests then it is not possible to require formal linkage of drainage solutions however it would be good practice for consideration of water management to be cognisant of relevant sites in the surrounding area. **No modification proposed.**

### **H34: Orchard Brae**

Alasdair Grant (0089), Isabel Steel (0245)

The estimated capacity is based on an assessment of what may be appropriate for the site in its context. The first development principle for this site set out in Appendix D states that the heights must be lower than the existing building and layout/massing must be sympathetic to the surrounding urban form. **No modification proposed.**

Isabel Steel (0245)

It is for detailed applications to set out specific details of new buildings shall. City Plan policy Env 33 protects the amenity of existing homes and residents.

Work informing City Plan parking standards was undertaken to ensure the maximum parking standards set out were acceptable having accounted for levels of access to alternative travel in different parts of the City. **No modification proposed.**

Finance Development LLP (0688)

The Council is content that a height lower than the existing building is appropriate given that is substantially larger than the properties to the north and west. Replicating the existing built form would likely have detrimental impacts.

On office provision it the development principles are to be read with the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides the appropriate framework for consideration of this proposal. Policy Econ 5 sets out how proposals to redevelop existing employment sites would re-provide a level of business and commercial floorspace. See Issue 35 on Economy Policies. **No modification proposed.**

Callum Melville (0155)

The design and layout of the site, including paths and how these link to the surrounding area, would be addressed as part of the planning application process. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process.

As this proposal and H34 are separate and may come forward from different developers and land interests then it is not possible to require formal linkage of drainage solutions however it would be good practice for consideration of water management to be cognisant of relevant sites in the surrounding area. **No modification proposed.**

**H35: Salamander Place**

Alison Winkler (0041)

The development principles for this proposal are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides the appropriate framework for consideration of this proposal. This includes Policy 33 (Amenity) which sets out requirements for proposals on matters such as impact on daylight on neighbouring properties and overlooking.

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts.

Providing grants to home owners is not a City Plan matter. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing



housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Hilary Hines (0265)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

In terms of space for recreation the development principles are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan in this regard provides the appropriate framework for consideration of this proposal. Policies Env 6 and Env 32 are relevant. The third development principle of appendix D sets out requirements.

The Council's Open Space Strategy (CD066) provides an analysis of which areas are considered to be adequately served by play facilities. This site is within such an area and so there is no requirement for additional facilities to be provided. **No modification proposed.**

SEPA (0012)

Appendix D notes that a Flood Risk Assessment is required for the site. The Council considers the development management process can account for this. **No modification proposed.**

### **H36: North Fort Street**

Simon Thomson (0248)

The Council's position on Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. Appendix D for this site also notes the requirement for this site to provide a surface water management plan. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H37: Coburg Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable. **No modification proposed**

Emma Whifield (0031)

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan i provides the appropriate framework for consideration of this proposal. Policy Env 33 provides for the protection the amenity of neighbouring properties from new development. Policy Econ 5 sets out that proposals to redevelop existing employment sites require to re-provide a level of business and commercial floorspace. Design policies are applicable to issues of scale and visual impact of development, including Env 1 'Design Quality and Context; Env 25 'Layout Design' and 26 'Housing Density'. **No modification proposed.**

SEPA (0012)

A Flood Risk Assessment is required for this site the Council considers it is for the development management process to establish the scope and detailed matters to be taken into account in such FRAs.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H38: Commercial Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

SEPA (0012)

A Flood Risk Assessment is required for this site. The Council considers it is for the development management process to establish the scope and detailed matters to be taken into account in such FRAs.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

### **H39: Pitt Street**

Kenneth MacLean (0046)

The boundary for site H39 Pitt Street does not signal an intention to demolish any residential properties. However, should the Reporter be so minded clarification can be added to Appendix D site principles for clarity.

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

J. Smart & Co. (Contractors) PLC (0483)

The Council notes that J Smart & Co. have stated in representation that they have ownership interests (full or part) this site and are willing to engage positively to discuss their future development.

### **H40: Steads Place**

Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content that the wording 'expected to' is clear. **No modification proposed.**

Leith Central Community Council (0614)

Active Trave Proposal ATPR38 provides the safeguarding proposed insofar as it relates to this housing proposal. For active travel proposals see Issue 33. **No modification proposed.**

Mark Ockendon (0419)

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides the appropriate framework for consideration of this proposal. Design policies are potentially applicable to issues of scale and visual impact of development, including Env 1 'Design Quality and Context', Env 25 'Layout Design' and 26 'Housing Density'. **No modification proposed.**

Cockburn Association (0777)

The Council considers this Place Policy alongside the wider provisions of City Plan, including subject policies, as well as associated Edinburgh Design Guidance CD047 provides sufficient framework for this proposal as it stands. **No modification proposed.**

Cockburn Association (0777), Leith Central Community Council (0614)

The City Plan mapping and development principles for sites is based on the extent of Conservation Areas as designated presently. If/when Conservation Areas are extended however then the provisions of the City Plan relating to Conservation Areas (such as policies Env 13 and Env 14) would apply to development in those areas. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H41: Jane Street**

Shortbread House of Edinburgh Ltd (0619)

The allocation of site H41 is for a housing led mixed use development. It is not the intention that this site or similar sites within the plan would be solely residential. The plan allocates such sites as a means to address the consistent trend for sites in similar locations to change from previous commercial uses to residential without adequate mix of uses and facilities ensuring they are properly planned and coordinated.

The forced relocation or closure of existing business does not form part of the strategy of the plan and there is no intention to require the Shortbread House to leave the site.

The business already operates within a wider mix of uses including residential nearby, and it is not considered that development of the wider site would prohibit the continued operation of the business or expansion, subject to the coordinate and planning of uses.

For other businesses who wish to reallocate and where they are unable to be integrated into mixed use development, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses.

The diagram Map 22 accompanying Place Policy 8 is indicative noting that the proposed 'principal street' circles the Shortbread House site. It is not the intention to prevent access to the business or operations. Proposals coming forward for development will be required to show how they coordinate with existing uses at the planning application stage. **No modification proposed.**

Deidre Brock MP (0801), Leith Links Community Council (0617), Newbarns Brewery (0653), APS Group (Scotland) Ltd (0518), Ramsay Cornish Auctioneers Ltd. (0685), Paul Gibson (0559)

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan in this regard provides the appropriate framework for consideration of this proposal. It is noted that development principle b. sets out the requirement for re-provision of class 4 uses and this is supported by Policy Econ 5 which sets out the position for proposals which would redevelop existing employment sites and the re-provision of business and commercial floorspace, including for existing uses where appropriate.

In cases where full re-provision of employment use on site is not possible due to use type or physical characteristics, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses.

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts.

**No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP and draft NPF 4 in this respect (see paragraph 46.)

The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance CD047 sets out details on electric vehicle

charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan in this regard provides the appropriate framework for consideration of this proposal. City Plan's design policies are applicable to issues of the scale of visual development, particularly Env 1 'Design Quality and Context', Env 26 'Housing Density' and Env 30 'Building Heights'. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Leith Central Community Council (0614)

The development principles for this proposal should be read with the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by the Plan provides for consideration of this proposal. As stated in paragraph 3.154 Place Policy maps do not necessarily show the full extent of open space provision required for a development and they must be read in conjunction with open space policies (either Env 31 or Env 32) to ensure an appropriate level of space is provided. Policy Env 27 sets out minimum requirements for tree canopy coverage.

The disused railway line between St Mark's Park and Easter Road and further east is identified in City Plan as a Strategic Active Travel Project and Safeguard (ATSR 5). As such there is not a further need to safeguard this as a green network proposal in this plan. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**

J. Smart & Co. (Contractors) PLC (0483)

The Council notes that J Smart & Co. have stated in representation that they have ownership interests (full or part) in this site and are willing to engage positively to discuss their future development.

**H42: Leith Walk/Manderston Street**

SEPA (0012)

This site combines two sites referred to in the Strategic Flood Risk Assessment CD011 as Leith Walk (Depot) and Leith Walk/Manderston Street.

Policy Env 36 requires detailed applications to provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H43: West Bowling Green Street**

Water of Leith Conservation Trust (0392)

The routes on Place Policy maps are illustrated for a specific purpose noted in the map key. Other routes are not shown, however, this does not reduce their status.

Policy Env 29 Waterside Development sets out requirements for buffer zones that apply to various circumstances. As such a modification as proposed for buffer zones is not considered necessary. **No modification proposed.**

Leith Links Community Council (0617)

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles should be read as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by the Plan provides for consideration of this proposal. Policy Econ 5 sets out the position where proposals

would redevelop existing employment sites and the re-provision of business and commercial floorspace, including for existing uses where appropriate.

In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. **No modification proposed.**

#### SEPA (0012)

The Council sees it is for the development management process to establish the scope and detailed matters to be taken into account in FRAs.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Synergy Group Fitness (0806)

Policy Econ 5 sets out the position for proposals which would redevelop existing employment sites and the re-provision a level of business and commercial floorspace, including for existing uses where appropriate. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248), Synergy Group Fitness (0806)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**



Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in this respect (see paragraph 46.) The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

Jodi Duffin (0264)

The matters raised relating to construction are not addressed as part of City Plan given there are more appropriate processes for controlling the impact of these such as through Development Management and Environmental Protection.

Policy 33 (Amenity) sets out requirements for proposals on amenity, including impact on daylight of neighbouring properties and overlooking. **No modification proposed.**

Kate Soane (0260)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides for consideration of this proposal. Policy Econ 5 sets out where proposals which would redevelop existing employment sites would re-provide business and commercial floorspace, including for existing uses where appropriate.

In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. Issue 33 considers Active Travel Proposals. **No modification proposed.**

**H44: Newhaven Road 1**

Leith Central Community Council (0614)

The Council considers this proposal is sufficiently clearly marked. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in this respect (see paragraph 46.) The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

Kate Soane (0260)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles for this proposal are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan for consideration of this proposal. Policy Econ 5 sets out where proposals to redevelop existing employment sites would re-provide business and commercial floorspace, including for existing uses where appropriate.

In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. Issue 33 considers Active Travel Proposals. **No modification proposed.**

#### **H45: Newhaven Road 2**

##### SEPA (0012)

It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

##### Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**

##### Leith Central Community Council (0614), Liane Montgomery (0030)

The Council considers this proposal is sufficiently clearly marked.

The development principles are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides for consideration of this proposal. Policy 33 (Amenity) sets out requirements for proposals to meet on amenity matters including impact on daylight on neighbouring properties and overlooking. Policy Env 29 considers Waterside Development and makes provision for buffers which address issues, including overshadowing.

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248), Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (0736)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

Kate Soane (0260), Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (0736)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles for this proposal are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan for consideration of this proposal. Policy Econ 5 sets out

where proposals to redevelop existing employment sites would re-provide business and commercial floorspace, including for existing uses where appropriate.

In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the Spatial Strategy is set out in Issue 2, with Issue 3 addressing the delivery of Spatial Strategy, including the matter of the effect of the Plan on existing business uses within proposal sites in City Plan. See Issue 33 in relation to Active Travel Proposals. **No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP CD096 and draft NPF 4 CD099 in this respect (see paragraph 46.)

The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance CD047 sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal.

Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (0736)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area. Policy Env 26 (Housing Density) sets out that developments should deliver housing in line with capacities set out in the Plan. Planning applications may be submitted with numbers that vary from these figures. If so it will be for the decision maker to assess this.

Principles b and c relate to different uses and so the Council is content that these should be different principles. The Council is also content it is appropriate for them to set a certain level of proportionality in this instance given the understanding it has taken of the context.

No evidence has been provided on why the provision of open space on this site is held to excessively harm viability. The Plan's open space standards for this proposal do not vary significantly from those for other sites. Viability can be assessed as a material consideration at the planning application stage. **No modification proposed.**

#### **H46: Bangor Road**

SEPA (0012)

It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in this respect (see paragraph 46.) The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2, with Issue 3 addressing the delivery of Spatial Strategy, including effect of the Plan on existing business uses within proposal sites in City Plan. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

Ali Hall (0072)

The development principles are to be read as part of the Plan as a whole. This includes Policy Env 33 (Amenity) which sets out requirements for proposals to meet in respect of matters such as impact on daylight on neighbouring properties and overlooking. **No modification proposed.**

J. Smart & Co. (Contractors) PLC (0483)

The Council notes that J Smart & Co. have stated in representation that they have ownership interests (full or part) this site and are willing to engage positively to discuss their future development. **No modification proposed.**

**H47: South Fort Street**

#### SEPA (0012)

It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**

#### Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in this respect (see paragraph 46.) The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

#### **H48: Stewartfield**

Rachel Ross (0784), David Williams (0643), Jennifer Reaves (0299), Anne Meikle (0286), Sarah Farrell (0473), Gillian Rae (0571), Hew Dalrymple (0238), Framework (Edinburgh) Limited (0743)

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles for this proposal are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City provides for consideration of this proposal. Policy Econ 5 sets out where proposals to redevelop existing employment sites would re-provide business and commercial floorspace, including for existing uses where appropriate.

In cases where full reprovision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. **No modification proposed.**

#### SEPA (0012)

It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The Council considers this proposal adequately establishes pedestrian priority in the movement hierarchy, with the reference to *limited* car parking being reasonable for this location.

The Council is content with the wording 'expected to' is sufficiently clear in establishing the clear level of import for measure in question. **No modification proposed.**

#### Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP (CD096) and draft NPF 4 (CD099) in this respect (see paragraph 46.) The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance (CD047) sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)



The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

Gareth Hutchinson (0290)

It is not within the locus of City Plan to make provision for the cancellation of parking permits. This is addressed by a separate legislative regime to Planning. **No modification proposed.**

Jennifer Reaves (0299), Anne Meikle (0286), Sarah Farrell (0473), Liane Montgomery (0030), Katrina Danson (0301)

The development principles for this proposal are to be read as part of the Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides for consideration of this proposal. Policy Env 11 sets out that proposals should not have a detrimental impact on the setting of a Listed building. Policy 33 (Amenity) sets out requirements for proposals on matters such as impact on daylight on neighbouring properties and overlooking. Policy Env 20 makes provision for the Protection of Trees.

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts. Scottish Water has been consulted and raised no objections to this proposal in terms of the sewer network. **No modification proposed.**

Liane Montgomery (0030), Gillian Rae (0571)

Issues relating to noise from building relate to construction aspects of a proposal and are more appropriately addressed by Environmental Health and Development Management processes. **No modification proposed.**

Gillian Rae (0571)

The proposal (including its design principles and capacity) is based on an assessment of what may be appropriate for the site which was cognisant of the character, heights and

densities in the surrounding area. The development principles are to be read as part of City Plan as a whole, including subject policies relating to these issues. The development principles are to be read as part of the Plan as a whole. This includes policies relating to the scale and visual impact of development, including Env 1 'Design Quality and Context', Env 25 'Layout Design' and 26 'Housing Density'. Policy 33 (Amenity) sets out requirements for proposals to meet on amenity, including impact on daylight on neighbouring properties and overlooking. Policy Env 6 addresses issues of green blue features and networks and the importance of retaining and linking to these where possible. Policy Env 20 considers the value of trees including the attributes noted in representation. Policy Env 7 makes provision for assessment of net carbon impact from redevelopment proposals.

Creating greater linkages between closed off areas such as cul-de-sacs is considered positive. Increased footfall may result from this, which can increase vitality and passive surveillance. An increased level of connection between closed off areas is, active travel and contributing to health, wellbeing and encouraging non-vehicular journeys with reductions in carbon emissions and other pollution to benefit air quality. **No modification proposed.**

Katrina Danson (0301)

The Council does not consider the proposal would result in a net loss of open space. The Plan sets out a framework which should achieve a net betterment in terms of open space for this site as set out in Map 23, the development principles for the site and the provisions of Policy Env 32. **No modification proposed.**

Kate Soane (0260)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles are to be read as part of the Plan as a whole. This includes policy Econ 5 sets out the position for proposals which would redevelop existing employment sites and the re-provision a level of business and commercial floorspace, including for existing uses where appropriate. See Issue 35 'Economy Policies'

In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect

of the Plan on existing business uses. See Issue 33 in relation to Active Travel Proposals. **No modification proposed.**

J. Smart & Co. (Contractors) PLC (0483)

The Council notes that J Smart & Co. have stated in representation that they have ownership interests (full or part) this site and are willing to engage positively to discuss their future development. . **No modification proposed.**

**H49: Coruna Place**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites can come forward for development in the period of the plan.

The housing proposal reference on map 23 is appropriate as this reflects the reference in Housing Proposals in Table 2. There is no need to refer to Place policies in this map since the map is contained amongst the Place Policies in question anyway. **No modification proposed.**

**H50: Bonnington Road**

Christine Nurse (0323), Catherine Ness (0642), Sarah Roberts (0630),  
Richard Cherns (0476)

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

The development principles are to be read as part of the Plan as a whole. This includes policy Econ 5 sets out the position for proposals which would redevelop existing employment sites and the re-provision a level of business and commercial floorspace, including for existing uses where appropriate. See Issue 35 'Economy Policies' In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites can come forward for development in the period of the plan. **No modification proposed.**

Sarah Roberts (0630)

The development principles are to be read as part of the Plan as a whole. This includes policy Env 32 is particularly applicable to the point raised in representation relating to the need for new open space. **No modification proposed.**

Richard Cherns (0476)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

The development principles are to be read as part of the Plan as a whole. This includes Policy 33 (Amenity) which sets out requirements for proposals to meet in terms of impact on neighbouring amenity and that of future occupiers. Supporting text for this policy makes clear this protects public and private amenity spaces also.

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts. **No modification proposed.**

Forth District Salmon Fishery Board - Crown Estate Scotland (0346)

The development principles are to be read as part of the Plan as a whole. This includes Policy 29 sets out requirements in respect of Waterside Development, including the extent to which a buffer may be required alongside watercourses. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H51: Broughton Road**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites can come forward for development in the period of the plan. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H52: Iona Street**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H53: Albert Street**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are capable of coming forward for development in the period of the plan. **No modification proposed.**

Matthew Gason (0090)

Matters relating to the property value and marketability of neighbouring properties are not material planning considerations.

Policy 33 (Amenity) sets out requirements for proposals to meet on matters such as impact on daylight on neighbouring properties and overlooking. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H54: St. Clair Street**

##### SEPA (0012)

The Strategic Flood Risk Assessment CD011 identifies this site as requiring a Flood Risk Assessment. There is no reference to a strategic SUDS solution for this site in the Strategic Appraisal. The Plan and Appendix D reflect this.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

##### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are capable of coming forward for development in the period of the plan. **No modification proposed.**

##### J. Smart & Co. (Contractors) PLC (0483)

The Council notes that J Smart & Co. have stated in representation that they have ownership interests (full or part) this site and are willing to engage positively to discuss their future development. **No modification proposed.**

#### **H55: Seafield**

##### The Royal London Mutual Insurance Society Ltd (0149), Manse (Seafield) LLP (0212), Inverdunning (Hatton Mains) Ltd (0427)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are capable of coming forward for development in the period of the plan.

The plan aims to deliver the land needed to meet Edinburgh's housing needs and to direct new development to, and maximise the use of, brownfield land rather than greenfield land. The site was identified in the Edinburgh Local Development Plan Housing Study 2020 CD026 which assessed the potential for new residential development within the urban area. It provides a brownfield site in line with the aim of the plan to maximise the use of brownfield land rather than greenfield land. Given the need for housing land and the strategy of the plan it is appropriate that this site is allocated for housing.

It is noted that development principle b. sets out the re-provision of class 4 uses and this is supported by policy Econ 5 which sets out the position for proposals which would redevelop existing employment sites and the re-provision a level of business and commercial floorspace, including for existing uses where appropriate. See Issue 35 regarding Economy Policies.

In cases where full re-provision of employment use on site is not possible, the plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the Spatial Strategy is set out in Issue 2, with Issue 3 addressing the delivery of Spatial Strategy, including the matter of the effect of the Plan on existing business uses within proposal sites in City Plan

The Council notes that proposal H55 for Seafield has an estimated capacity of 800 units. This capacity has been estimated in cognisance of a range of factors relating to the site which this capacity figure acknowledges as meaning housing delivery expectations for this site in the plan period are lower than may exist for other sites of a comparatively similar gross site area. **No modification proposed.**

David Thomson (0538), Alastair Cameron (0145), Anne Thomson (0551), Ursula Wright (0662), Action Porty (0250), Jennifer Elliot (0791), Anna Brand (0742), Gemma Sethsmith (0694), David Cooper (0735), Serge Marti (0745), Peter Allen (0336), Julie Robertson (0210), Portobello Amenity Society (0612), Suzanne McIntosh (0409), Oonagh O'Brien (0585), Diana Cairns (0452), Lawrence Marshall (0702), Stephen Ian Hawking (0469)

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts.

The development principles are to be read as part of the Plan as a whole. City Plan's design policies are applicable to issues of the scale of visual development, particularly Env 1 'Design Quality and Context', Env 26 'Housing Density' and Env 30 'Building Heights'. Policy Env 32 sets out requirements for provision of open space within new development which is important as part of ensuring that new residents are not solely required to utilize existing amenity spaces. Policy Hou 3 makes provision for mixed communities. The requirement for a Place Brief for this site is part of ensuring an appropriate mix of land uses and so there is less need to be exacting in the specification of these in the development principles of the City Plan itself.

The Place Brief process involves consultation with local communities to ensure full consideration of input from this key stakeholder group to help shape the Brief and master planning. The further detail of this should be through that process and not in the Plan itself. The Glossary defines Place Brief as being informed by outcomes from community engagement so restatement of this is not necessary.

The Council as paragraph 3.46 states that proposals submitted in advance of the Place Brief shall be considered premature there is no need for a modification to state no development to take place until the Masterplan. It is for the Place Brief to establish how proposals are best illustrated. This may take the form of a masterplan however it does not benefit the Brief to state this definitively at this stage. It is unclear what is envisaged in considering that the Brief must be approved by 'the community'. Community engagement is a critical part of the process, though there is no formal mechanism for defining or seeking this - it is not precise as to what this would mean in real terms.

The modification seeking to set out controls over 'informal consultation between landowners/ developers and council/ planners' in parallel with the Place Brief or Master plan processes is considered excessive and unreasonable. The Council is in dialogue with stakeholders, including those from the community and landowners/ developers. The Council considers that discussion of development proposals should take be informed by the Place Brief process but there are both formal application and pre-application processes which the Council is required to consider even where such applications are premature to the outcome of a Place Brief. **No modification proposed.**

Manse (Seafield) LLP (0212), Arnold Clark Automobiles Ltd (0750),  
Inverdunning (Hatton Mains) Ltd (0427), The Royal London Mutual Insurance Society Ltd (0149),

The Council considers that the location, context, nature, constraints and opportunities of the site are sufficiently complex to require a Place Brief. The multiple existing ownerships and land uses are also significant factors in requiring a coordinated approach to development to avoid premature and piecemeal development that does not deliver key land uses and infrastructure as necessary to serve and unlock the site to maximise development potential. The Place Brief process includes engagement with land interests for all those reasons. A Place Brief shall be produced in good time such that it will be in place for the early part of the Plan period. **No modification proposed.**

Edinburgh Dog and Cat Home (0310)

It is acknowledged that the EDCH is a valuable asset to Edinburgh and the wider region. It is in part for these reasons that the site was not indicated for potential inclusion in the mapping for the Choices for City Plan Main Issues Report, though it is acknowledged that the site is within the indicative mapping of the Environmental Report (CD024) at the Main Issues Report stage, though not in the mapping in the Main Issues Report.

It is further noted as per the representation comments, that the facility is physically constrained and faces challenges in modification and that they consider that the reprovision of the EDCG elsewhere or as a modernised facility on site is needed. Inclusion within the H55 site could facilitate this.



The site is brownfield land and within the existing Urban Area with no protecting designation for the existing use. Therefore, redevelopment and change of use is supported by existing LDP policies in general principle, subject to technical considerations. The site's location, adjoining site H55 to the south and west with the promenade and shore to the north-east, makes for a logical addition to site H55. If the Reporter sees merit in recommending such a change, the Council considers that this could assist in achieving a comprehensive development through the Place Brief and the subsequent masterplanned approach to the H55 site as a whole. The Reporter may also see merit in considering the implications of inclusion on the H55 site capacity as stated in the Plan.

**No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council notes that this Place policy does not explicitly state the presumption in favour of pedestrian priority in the manner stated in other proposals. However, the site requires both a place brief and masterplan to come forward which will address issues of pedestrian priority. **No modification proposed.**

Mark Ockendon (0419)

The Council is content that the principle of pedestrian priority and limited private parking on-street is reasonable in this instance and in-line with the Aims, Outcomes and Strategy of City Plan – which in turn is in accord with SPP CD096 and draft NPF 4 CD099 in this respect (see paragraph 46.). The overall approach to integrated transport and electric vehicle charging are addressed in Issue 31. The Edinburgh Design Guidance CD047 sets out details on electric vehicle charging, and Policy Inf 7 requires that private parking provides electric vehicle charging provision. It is not necessary to state this requirement again in this proposal. **No modification proposed.**

Scottish Water (0342)

The location of assets relating to the waste water treatment plant should be identified as part of the development management and building standards processes. However, it is acknowledged that taking account of these in the Place Brief would ensure cohesive and coordinated planning and that an additional principle could be added for clarity, should the Reporter be so minded.

NatureScot (0528)

City Plan makes provision for the Council as planning authority to have the required decision making power over the approach taken to responding to coastal erosion, sea level rise and coastal flood risk. The Place Brief for the site which shall be informed by the flood risk and coastal erosion appraisal.

Miller Homes (0256)

As stated in paragraph 3.52 the Council does not consider the proposal would have an adverse impact on the integrity of a European site subject to mitigation. Paragraphs 3.50 and 3.51 incorporate mitigation measures set out on page 22 of the HRA. **No modification proposed.**

RSPB (0648)

City Plan sets out in paragraph 3.48 that there could be adverse impacts from both construction and operational phases. Para 3.50 provides some mitigation measures however further measures may be required and this would be considered further as part of an application, with Policy Env 21 (Protection of Biodiversity) setting out requirements in this regard to ensure mitigation (with this covering both construction and operational impacts).

Amendment of paragraph 3.52 to state that mitigation measures noted in paragraph 3.50 are not exhaustive would add clarity, if the Reporter is so minded.

#### SEPA (0012)

A Flood Risk Assessment is required for this site. It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Portobello Community Council (0206)

Paragraph 3.45 states the Flood risk and Erosion appraisal will inform the Place Brief. Paragraph 3.46 states development in advance of this Place Brief shall be considered premature. By implication this means applications submitted before the Flood Risk and Erosion Appraisal will also have been lodged before the Place Brief and therefore be premature. **No modification required.**

#### **H56: Sir Harry Lauder Road**

#### Portobello Community Council (0206)

The Council considers it appropriate for further details on the exact siting and scale of new commercial space within the site to be established through the planning application process with due regard to adjacent development and the surrounding context. The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by the Plan provides the for consideration of this proposal. Policy Econ 5 sets out where proposals to redevelop existing employment sites would re-provide business and commercial floorspace. Policies Env 25 and Env 27 as well as Env 6, and the Edinburgh Design Guidance CD047, will ensure the site appropriately addresses the adjacent development. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue

20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### SEPA (0012)

A Flood Risk Assessment is required for this site. It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Portobello Amenity Society (0612)

This representation supports the need for commercial space within the last part of the development covered by the North West Portobello Development Brief.

#### **H57: Joppa Road**

Mary Burgess (0456), Beverley Burgess (0605), Kim McFarlane (0698),  
Oonagh O'Brien (0585), Morgan Smith (0788), John Gerard Holligan (0412),  
Bridget Campbell (0706), Corrie Fairweather-Mills (0527)

The estimated capacity for this proposal is based on an assessment of what may be appropriate for the site which was cognisant of heights and densities in the surrounding area.

The impacts of this proposal and others has been assessed through appraisals of impacts on infrastructure, including Healthcare (CD016), Transport (CD014) and Education (CD015). A Strategic Flood Risk Appraisal (CD011), including surface water flood risk, has been undertaken. The impacts are considered acceptable, subject to appropriate mitigation as provided for particularly in Policy Inf 3 'Infrastructure Delivery and Developer Contributions'. Issues 27-31 consider infrastructure impacts.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. This includes Policy 3 (Amenity) which sets out requirements for proposals to meet in respect of matters such as impact on daylight on neighbouring properties and overlooking. City Plan's design policies are applicable to issues of the scale of visual development, particularly Env 1 'Design Quality and Context', Env 26 'Housing Density' and Env 30 'Building Heights'.

Issues relating to noise from building relate to construction aspects of a proposal and are more appropriately addressed by Environmental Health and Development Management processes. **No modification proposed.**

#### Corrie Fairweather-Mills (0527)

Creating greater linkages between closed off areas such as cul-de-sacs is, on balance, considered to be a positive attribute. **No modification proposed.**

Craig McIntyre (0709), Nadia McIntyre (0704)

A strategic appraisal of Flood risk CD011, including surface water flood risk, has also been undertaken and considered that the site was at Low Flood risk.

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. This includes Policy 3 (Amenity) which sets out requirements for proposals to meet in respect of matters such as impact on daylight on neighbouring properties and overlooking. City Plan's design policies are applicable to issues of the scale of visual development, particularly Env 1 'Design Quality and Context', Env 26 'Housing Density' and Env 30 'Building Heights'.

The refusal of planning applications previously on this site does not preclude the consideration of this site for residential use as part of City Plan. The Aims and Strategy of the Plan and appraisal of merits of the site demonstrate potential in principle as a Housing proposal. **No modification proposed.**

#### Portobello Community Council (0206)

The Council understands the importance of the point made however it is considered that this is appropriately captured by policy Env 14: Conservation Areas – Development. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance CD077. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Portobello Amenity Society (0612)

This representation fully supports the need for any future development to recognise the particular characteristics of the Portobello Conservation Area especially with regard to building height.

#### **H58: Eastfield**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

The Council's position on the Spatial Strategy is set out in Issue 2. Issue 3 addresses the delivery of Spatial Strategy, including the effect of the Plan on existing business uses. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### SEPA (0012)

The Council has had regard to the SFRA (CD011) and flood risk mapping, however it considers the height of the main part of this site above water level i.e. sources of flood risk means the Council is content this site can be developed despite their proximity.

It is for the development management process to establish the scope and detailed matters for FRAs. Issues of surface water flooding within and adjacent to the site will require to be addressed as a result of Policy Env 36 (Designing for Surface Water). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Portobello Community Council (0206)

The development principles for this proposal are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council understands why has raised these matters however it is satisfied that the policies of City Plan would enable the development management process to deliver these. **No modification proposed**

#### Portobello Amenity Society (0612)

This representation supports the inclusion of paths and cycleways to provide easier connection to existing infrastructure at this point of the urban connection between Joppa and Musselburgh.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 6</b>	<b>Proposed sites- West Edinburgh</b>	
<b>Development plan reference:</b>	Part 3: pages 71-83, Part 4: Table 2, page 162, Table 8, pages 174-176 and Table 13, page 184.	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <div> Allan Old (0394)  Ambassador Group (0683)  Anna Brand (0742)  Anna Goodwin (0302)  APAM/Bankfoot APAM (0355)  Archie Clark (0003)  BDW Trading (0350)  Ben McCready (0515)  CALA Management Ltd (0465)  Cockburn Association (0777)  Corstorphine Community Council (0799)  Cramond &amp; Barnton Community Council (0243)  Creos Property Limited (0253)  Crosswind Developments Ltd (0184)  Dave Campbell (0492)  Duncan Graham (0651)  Edinburgh Airport Limited (0761)  Edinburgh Airport Noise Advisory Board (0691)  Edinburgh Airport Noise Advisory Board (EANAB) (0720)  Edinburgh World Heritage (0339)  Esme Clelland (0778)  Fiona Roberson (0133)  Frances Guy (0589)  Friends of Cammo (0387)  Gayle Green (0408)  Genna Spears (0081)  George Paver (0150)  Hallam Land Management (0599)  Hallam Land Management (0615)  Heriot Watt University (0468)  Inverdunning (Hatton Mains) Ltd (0427)  Jamie Wallace (0167)  Jansons Property (0733)  Juniper Green &amp; Baberton Mains Community Council (0306)  Kirsten Mackie (0529)  L Gunstensen (0663)  Living Streets Edinburgh Group (0486)  Lord Dalmeny (0475)  Lynn Dorio (0622) </div> <div> NatureScot (0528)  NatWest (0477)  Nigel Green (0050)  Parabola Edinburgh Limited (0723)  Pawel Stankiewicz (0445)  Persimmon Homes (0495)  Peter Niccol (0296)  Peter Wilkinson (0493)  Queensferry and District Community Council (0568)  Ratho and District Community Council (0289)  Redline Planning Services Ltd (0673)  Robert Falcon (0640)  Robertson Residential Group Limited (0490)  Robin Knops (0494)  Robyn Mackay (0005)  Rosebury Estate (Bankhead) (0618)  Ross Urquhart (0029)  Royal Highland &amp; Agricultural Society of Scotland. (0482)  Royal Mail Group Limited (0501)  RSPB (0648)  Ryden LLP (0578)  SAICA (0590)  Sarah Adamson (0523)  Scottish Government-Planning and Architecture Division-Development Plans Team. (0309)  SEEDco (0198)  SEPA (0012)  Sheena Moffat (0366)  Shelborn Edinburgh Limited (0732)  Simon Thomson (0248)  Spokes Lothian (0545)  Stewart Milne Homes (0118)  Stirling Developments Limited (0303)  Susan Stewart (0567)  Tarmac (0244)  Taylor Wimpey (0200) </div> </div>		

Mariel Roy (0417) Mark Ockendon (0419) Miller Homes Limited (0649) Mr Rodger Thomas (0345) Mrs Patricia Stott (0349) Mrs Sheena Craigen (0548) Murray Estates (0197) Myself and my husband, Graham Wilson (0279)	Taylor Wimpey and Hallam Land Management (0603) The Association for the Protection of Rural Scotland (0334) West Craigs Limited (0472) West Town Edinburgh Ltd (0660)
<b>Provision of the development plan to which the issue relates:</b>	This section of the plan sets out place policies and identifies housing proposals in West Edinburgh.
<b>Planning authority's summary of the representation(s):</b>	
<p><b>Place 16: West Edinburgh</b></p> <p><u>SAICA (0590)</u></p> <p>Further clarification is required on how the Council will co-ordinate a collaborative, multidisciplinary masterplan approach to development across these sites. Individual applications have already been advanced and in particular with regard to the subject H59 and H60 sites. Additional provision is proposed with regard to phasing to ensure that sites such as H59 can be delivered early in the plan period and are not unduly delayed on account of wider Place 16 complexities.</p> <p>Objects to:</p> <p>The identification of any primary school site requirement – indicative/potential or otherwise within H59: A dedicated school for the H59 SAICA and H60 Turnhouse Road allocations is not justified, as demonstrated by the submitted Education Assessment.</p> <p>The identification of a need for 5 primary schools to serve the West Edinburgh allocations (Place 16): It is calculated that likely only 3 new schools (and possibly even 2) would be required in the fullness of time to service the wider West Edinburgh (Place 16) development pipeline.</p> <p><u>SEPA (0012)</u></p> <p>We fully support Proposal BGN49 and we will work with the Council and other partners to deliver the best option. Section 3.61j needs to be clarified. "Designed as proposals allow to reroute the Gogar Burn". This could be taken to mean that if a proposal does not allow for it then the proposal will not be implemented.</p> <p>A flood risk assessment is required and a strategic approach to surface water management. We advise that as flood risk and surface water management are linked a strategic approach is needed to both.</p> <p>A detailed FRA which informs site design is required in order to ensure that there is no associated increase in flood risk out with the site and to ensure that there is no unacceptable flood risk for future uses of the site. This site could incorporate the Gogar Burn diversion scheme, which could have implications for the layout and design of the development. Should development go ahead without a wider understanding of the</p>	

catchment, there is a risk that the Gogar Burn realignment, which would deliver multiple benefits, may be jeopardised. Should the Gogar Burn not be realigned, this may affect the developable area as well. Multiple small drains and watercourses all require assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

Ratho and District Community Council (0289)

The Blue Green network must take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.

Infrastructure must be in place prior to the commencement of development and in particular improvements to the A8 and the Gogar Roundabout to meet the additional vehicular traffic.

Rosebery Estate (Bankhead) (0618)

Evidence is required to support the need for healthcare contributions

Robert Falcon (0640)

Aim 10: Delivering Edinburgh's key economic development needs should not include the West Edinburgh development - It is not acceptable to build on greenfield sites when adequate brownfield sites exist, in particular nearby at Maybury, Gyle and Redford Barracks, in addition to many other brownfield sites throughout the city. Business and office developments approved in principle in 2016 are clearly not required at the airport and therefore development on these sites should be cancelled altogether, rather than switched to housing.

West Craigs Limited (0472)

A specific placed based policy for Craigiehall within Proposed City Plan 2030 should be added.

Living Streets Edinburgh Group (0486)

There should be a clear reference to the transport hierarchy in the policy.

Mark Ockendon (0419)

Place 16, requirement I: append "and a clear view of the sky in keeping with Edinburgh's low-level building character".

Ryden LLP (0578)

Support the core principles and objectives of Place 16 West Edinburgh - Planning permission will be granted for development which will contribute towards the creation of new urban quarters in West Edinburgh (specifically H59, H60, H61, H62 and H63 on the Proposals Map), provided it accords with the West Edinburgh Development Principles and an approved masterplan approach to delivery, taking cognisance of all other development interests. Individual applications should not be delayed where they take account of wider



adjacencies. Further clarification is required on how the Council will co-ordinate a collaborative, multidisciplinary masterplan approach to development across these sites.

Contributions are required to deliver education provision to support the level of development outlined within West Edinburgh and a more detailed assessment on potential siting option is also required dependent upon timescales and phasing of delivery of individual sites.

#### Creos Property Limited (0253)

In principle, Creos are supportive of the Place Based Policies as they promote development on, and immediately adjacent to, the site in their ownership.

It is not currently clear how multiple Place Based Policies will apply to sites, and what Policy should take priority, therefore an explanatory note, or clarification on this point within the Proposed Plan, would be welcomed.

#### Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

In relation to West Edinburgh (Map 25), we note the divergence away from the expectations of NPF3 which designates the strategic airport enhancement as a national development. Due to the proposed shift in position, as signalled in draft NPF4, regarding this national development, we offer no proposed change in relation to this.

#### Shelborn Edinburgh Limited (0732)

Supportive in principle of the Proposed Place Policy, which encourages the development of West Edinburgh - Shelborn's interests at Edinburgh Park/ South Gyle sit adjacent to, and relate to, the significant growth proposed in West Edinburgh. The Edinburgh Park/ South Gyle area was not included within the boundary of the area that was covered by the West Edinburgh Strategic Design Framework, published in May 2010, and Shelborn would be grateful if the Council could clarify within the Proposed Plan how development proposals in Edinburgh Park/ South Gyle will also be required to adhere to the West Edinburgh Place Policy, if the area is already covered by the site specific Place Policy 19 and associated Development Principles.

#### Friends of Cammo (0387)

We agree that development in West Edinburgh (Place 16, page 71) should focus on the A8 and tram corridor, which is much better placed for transport links than any site north of Craigs Road

The large amounts of housing shown on page 162 as proposed will generate demand for access to large areas of greenspace for recreation, with Cammo Local Nature Reserve being the closest. Support the plan in Map 24 (page 73) that the only access crossing the railway line should be for public transport and active travel (bikes and pedestrians).

All of the housing proposals south of the railway, the proposals for housing at current industrial/commercial sites near Maybury and the current developments at Cammo Meadows and West Craigs will generate a large demand for active travel. We recommend

the development of more direct active travel routes to Cammo LNR than shown in the current plans, and other improvements to connections for active travel.

NatureScot (0528)

Support approach which will establish neighbourhood and place identity with higher densities of development and the creation of liveable neighbourhoods around public transport and active travel hubs, nodes and routes. Increased capacity of the path network in this area will be required to accommodate significant numbers of people.

West Edinburgh represents an opportunity to address strategic issues, particularly north-south green blue network connections that are currently weak and/or underdeveloped. Site is exposed, particularly in higher areas along and to the south of the tram line. Landform, planting and building form will be key factors in addressing exposure and making this a liveable place that is pleasant to spend time in and move through. Consideration should also be given to building height along the higher parts of the site – potential max height of 8 storeys may be dominant in views from existing areas and routes.

Cockburn Association (0777)

Require clarification of the mitigation measures which will address the negative environmental impacts identified in the Strategic Environmental Assessment Environmental Report.

Pawel Stankiewicz (0445)

A new paragraph should be added to say “Area up to 100 m from A8 is not used for housing” so as to not increase the number of people living in noise and pollution.

Hallam Land Management (0615), Tarmac (0244)

This section on West Edinburgh needs a complete review and clear justification before any decisions on a finalised plan is made. Supporting studies and resultant reports are required to justify the Council's recent change in approach to West Edinburgh proposals. The map on page 27 is misleading and the key needs rewording to align with policy/proposals.

There have been unacceptable changes in approach and philosophy for development in West Edinburgh since Choices report. The map on page 27 of the Proposed Plan, which identifies housing-led development, reflects in no way whatsoever the previously proposed map in the earlier Choices report, map 11. This reflects the inconsistency in approach and lack of joined up thinking between relevant stages in the Plan process. This change has not been supported or justified by additional supporting studies, nor has it been subject to proper consultation prior to being presented in the Proposed Plan.

Changes proposed for West Edinburgh by the Council do not accord to those proposals approved in NPF3, SDP and City Deal documentation, all of which promote a business-led approach to development. Seven strategic sites have been identified in the Strategic Development Plan as key areas of change and housing growth. West Edinburgh is not one of these agreed locations.

The number of housing units proposed in West Edinburgh conflicts with its overarching 'brownfield first' approach to housing land and the 'business led' approach for development of West Edinburgh. A statement in the Proposed Plan tries to simply justify this change in direction as a result of 'changes in the business and office market both pre and post Covid-19'. There is no supporting or background documentation provided by the Council to support this claim.

Neither the WETA or WETIP reports, on which the Council relies heavily within the Proposed Plan, assess or appraise the level of housing now being proposed.

Page 27 of the Proposed Plan provides a map of 'housing led' development sites. The key suggests most of these sites have been transposed from the LDP 2016 allocations. This is wholly inaccurate and misleading and needs to be clarified.

#### Crosswind Developments Ltd (0184)

CDL are supportive of a blended live-work community which will boost the local economy and help reduce car ownership and unnecessary travel.

As set out in the representation to Inf 1 Access to Community Facilities, CDL do seek an amendment to the wording of aim 1 of the City Plan 2030 Aims (p8) to include wheeling and cycling, as well as walking.

CDL are supportive of the brownfield first approach, in particular the inclusion of the Crosswind development site (H61), which is situated in a highly accessible location in West Edinburgh - adjacent to: Edinburgh International Airport; the A8; and, close to sustainable transport networks - mainline rail, bus networks, Edinburgh tram, and wider cycle and walking networks.

CDL are committed to achieving net-zero carbon within the H61 allocated site and are therefore supportive of aim 4 of the City Plan 2030 Aims highlighted on p8.

CDL are supportive of aim 5 of the City Plan 2030 Aims highlighted on p8, in general however this is qualified by detailed responses in other sections.

CDL wish to object to the blanket increase in the affordable housing requirement from 25 % to a minimum of 35 % as stated in aim 6 of the City Plan 2030 Aims. The currently approved SPP and the draft NPF4 advise of a 25 % affordable housing requirement. The draft NPF4 advises that "a higher contribution than this benchmark may be sought where justified by evidence of need". On this basis, an increase on 25 % would require justification and should be sought on a case by case basis, rather than as a blanket policy requirement.

CDL are supportive of the infrastructure first approach (Aim 8 of the City Plan 2030 Aims) and intend that the Crosswind site (allocated site H61) will be developed in this manner, however CDL do object to the level of the school infrastructure set out as required in West Edinburgh.

In terms of Aim 10 of the City Plan 2030 Aims, CDL object to the Strategic Business Centre area highlighted on the Proposals Map for West Edinburgh as it does not include

the CDL site and therefore does not support economic development including offices on that site. The CDL site is within the wider area that is identified as an Area of Economic Importance but there are no policies attributable to that designation and while Table 13 states that supporting uses will still include significant opportunities for business the policy position does not support this for the Crosswind site (H61).

In relation to the masterplan requirement for West Edinburgh, the policy provides no information on when, how and who will be involved in facilitating the creation of a masterplan, nor what the masterplan itself should comprise. There must be recognition that there is not an approved master plan for the West Edinburgh area. Concerned this will ultimately hinder development in the area coming forward in the short term. The Council can co-ordinate development to ensure the sites work together without the need for a full detailed master plan to which all parties must accord. A framework of connections would suffice to ensure joined up development. CDL have been working with the Airport and West Town Edinburgh to agree a Movement and Access Framework plan - this Movement and Access Plan should be recognised as the basis for co-ordinated development in West Edinburgh and means that a West Edinburgh Wide masterplan is not required giving the required level of detail to co-ordinate development between the neighbouring development sites while allowing each developer the opportunity to bring forward their own master planning proposals for consideration by the Council.

Generally supportive of the West Edinburgh Development Principles. However, it is concerning that none of these relate to Economic Development when this area is identified as important for such.

Support the recognition of H63 (Edinburgh 205) as a town centre, however this principle has omitted the designation of a local centre at site H61.

The Gogar Burn diversion, as set out in Map 24 and the proposals map, is yet to be evidenced as a viable route for a variety of reasons including land ownership and airport safety. Proposal BGN49 should be marked as 'indicative' on the map as the proposal has not yet been properly investigated.

Note the requirement for orbital bus routes and seek to highlight an inconsistency in the routing of the North South Orbital Bus Route. Seek the removal of the reference to the masterplan as transport connectivity can be completed on a site by site basis

Criterion m. should include the Airport Link Road and IBG Main Street which are WETA priorities to support development in the area and provide resilience for the existing road network.

Seek minor amendments to points 'n' and 'o' for consistency with the removal for the requirement for a masterplan

Map 24 (Page 73) includes one new primary school and a potential new high school within the Crosswind (H61) boundary. There is excessive school provision identified based upon Communities and Families calculation for CDLs current application.

In relation to Map 24:

Does not reflect or recognise 2 recent planning applications (20/03219/PPP and 21/00217/FUL). Each of these were accompanied by detailed justifications for new

proposed road alignments which were tested through TAs, EIAs, LVIA's and in terms of Design and Access Statements. These applications clearly represent the needs and development ambitions of the landowners (CDL and EAL) yet have not been adequately reflected on Map 24. CDL would like to see better alignment between these live proposals and the Proposed Plan. The map is not marked as indicative (others in the proposed plan are). This must be made clear so applications can deviate slightly from what is shown.

We wish to emphasise CDL's support for the identification of a town / local centre within the proposal site H61 as shown on Map 24. CDL wish to highlight that this is not however outlined on the Proposals Map and seek an amendment for its inclusion. CDL also wish to see an amendment to include this explicitly in Table 14 as a new town/local centre for site H61. There is no distinction between the town centre and local centre on Map 24, which is confusing as they are discussed separately elsewhere in the plan and should be marked separately for consistency. This is further complicated by Map 11, which notes a new local centre at a different location to the one shown on Map 24 and no town centre within H63 (IBG/ Edinburgh 205). We note the uncertainty around the town/local centre naming on Map 24. We seek confirmation as to whether it is proposed to be a town centre or a local centre within site H61. We note no clarification is provided in Table 14 'Network of Centres' as it just notes West Edinburgh as a "new centre". We suggest that, to be consistent with the Development Principles, H63 should have a town centre and site H61 a local centre.

The proposed primary school/education infrastructure are marked on in different locations between Map 24 and the proposals map.

The safeguard for river restoration route has not yet been evidenced as viable.

In relation to Map 25:

Identifies the whole of H61 for housing - the site is allocated for many purposes which include housing-led development and as area of economic and national importance. The shading of the whole area for housing is also fundamentally different to the designation shown on the main proposals map.

Does not clearly demonstrate the mixed-use nature of the site and appears to suggest the whole of the site should be deliverable for housing with ancillary uses. As per CDL's planning application (20/03219/PPP) their ambition is for a new digital quarter as part of a mixed-use development including 2500 new homes. To this end CDL would like Policy 16 to recognise the economic importance of this site and support that. CDL would like this site to be allocated for mixed use.

#### Edinburgh Airport Limited (0761)

It is considered that the requirement of a collaborative masterplan should be removed from Place Policy 16. Whilst working collaboratively with neighbouring developers, each development should be assessed on its own merits and its own masterplan/development proposals. Masterplan can be replaced by a co-ordinated Movement and Access Framework Plan.

Development principle j). should be deleted:

- Potential to increase bird strike risk.

- Any diversion or restoration of the Gogar Burn would need to be culverted and further mitigation would also be required.
- There is no effective way to manage or deter the risk created by new open water and so flight safety would be compromised.
- A proposed open channel Gogar Burn realignment to the eastern edge of the main runway would require significant earthworks to achieve and ground raising so levels would be created higher than the end of the runway. A channel with embankments to form a 5 m deep burn to flow into the River Almond would be required and this is not a very practical solution. A section of twin culverts is a more realistic engineering proposal for this area.
- Cost would be very high for little benefit over the existing situation given the continued need for culverts and channelization
- The existing Gogar Burn has over 15 surface water outfalls discharging into it from the airport, in addition to several others from City of Edinburgh Council roads and private buildings. The 20 km of surface water networks discharging to the burn, has had enormous infrastructure costs invested, and these cannot be diverted to the proposed new route due to gradient issues. Consequently, the existing burn and Gogar culvert would need to be retained as a surface water system discharging to the River Almond, should the upper section be diverted.

Note the requirement for orbital bus routes and seek to highlight an inconsistency in the routing of the North South Orbital Bus Route. Seek the removal of the reference to the masterplan as transport connectivity can be completed on a site by site basis.

Criterion m. should include the Airport Link Road and IBG Main Street which are WETA priorities to support development in the area and provide resilience for the existing road network.

Seek minor amendments to 'o' as outlined below for consistency with the removal for the requirement for a masterplan.

Several discrepancies between Map 24 (page 73) and the proposed Proposals Map in terms of various route alignments.

The new primary vehicle route on Map 24 is shown running directly through the Crosswind development site. This should be located on the eastern side, adjacent to the railway lines, to avoid running a Primary Road through the middle of the development site and a new local centre given the ambitions that this should be a car lite development. The only primary connection shown to the airport on Map 24 is when this road connects back onto Eastfield Road. This would not provide the needed resilience for traffic to and from the Airport and the wider area. an Airport Link Road as set out in the WETA Refresh 2016 (WETA 18) and in line with WE29 requires to be shown connecting to the Eastern Terminus. EAL propose that this is shown as an extension to the new primary route that we have requested is shown adjacent to the Railway line and that it should connect to the Airport Eastern Terminus via Eastfield Avenue.

Removal of the re-routing of the Gogar Burn / river restoration proposal. Map 24 shows safeguarding for river restoration for the proposed diversion of the Gogar Burn. It is entirely inappropriate to propose this running through the Airport's cargo area and along the edge of the runway and this route should be removed from the map. Edinburgh Airport

also object to the proposed diversion / river restoration of the Gogar Burn on the grounds of the potential to increase bird strike risk.

Remove the indicative location for a primary school identified within the airport's boundary.

The Association for the Protection of Rural Scotland (0334)

Supports the West Edinburgh Development Principles - a.) The topographical interest of Corstorphine Hill and the extensive woodland south of the A8 in the vicinity of the RBS HQ should also be reflected in the landscape design.

Archie Clark (0003)

The wide variety in size of local centres is not reflected in how they are described. Some have banks and/or Post Offices, others have no such facilities and is the objective not to make them within 10 minutes' walk of home?

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

3.54 "... Given changes in the business and office market both pre and post Covid-19 it is now considered appropriate to define a number of the parameters of development within this area as they inform a revised vision for West Edinburgh." Unused accommodation should be used before development is considered in West Edinburgh to prevent unnecessary urban sprawl. IBG, along with other approved developments will put pressure on to the road system adding to congestion at the Gogar roundabout. Green Belt development should be completely avoided as this will create problems on a wide variety of fronts – including loss of farmland, pollution, services provisions, drainage. As with the 'brownfield first' policy, unused accommodation should be used before development is considered in West Edinburgh in order to prevent unnecessary urban sprawl.

Para. 3.56 envisages that this area "will become a vibrant, high density, mixed use extension to the city with a focus on place making, sustainability, connectivity, biodiversity and a strong landscape framework" – The area will become over populated as people move out of town to living in a 'green field' development.

Map 25 – Sites are large and will require adequate facilities - a detailed fully-co-ordinated masterplan needs to be prepared by CEC to indicate the extent of shopping/ commercial/ administrative/ education/ workplace/ recreation facilities including full-sized football/rugby pitches in H63. Areas H59-H62 need to be incorporated so that residents are not encouraged to resort to their own transport. In total – a very large development that should be considered as a new town- complete with sufficient workplaces for the entire community.

Table 13 - Areas of Economic Importance: the proposals for West Edinburgh must be reviewed immediately after the 2022 Census, as this will inform and no doubt change the assessment of what additional housing will be required.

Developments proposed in areas H59-H63, coupled with the impact of LEZs and prohibitions on entering and parking in the centre of the city, will see the city centre hollowed out, with new greenfield development using up prime quality farmland. That goes against the issues raised at COP26 regarding climate change and is to be resisted.

Page 75, bullet I, refers to, “An iterative process with the use of TVIA...” with no explanation of what TVIA is (“Townscape and Visual Impact Assessment”?). Unclear descriptions like this require definition.

The huge developments proposed in areas H59-H63, coupled with the impact of LEZs and prohibitions on entering and parking in the centre of the city, will see the city centre hollowed out, with new greenfield development using up prime quality farmland. That goes against the issues raised at COP26 regarding climate change and is to be resisted.

#### Corstorphine Community Council (0799)

Residents concerned with in-progress and proposed developments to the west of the CCC boundary: New developments are likely to be detrimental to the existing community.

Issues raised generally relate to

- Increased traffic and congestion
- Pressure on local amenities and services such as healthcare and education
- Increased air pollution
- Reduced permeability for walking, wheeling and cycling, and road safety concerns.

Development principle q. A community that has a net zero carbon target. This is not explained in any detail - would like to see a clearer explanation of which elements of the West Edinburgh development will attempt to meet net zero carbon emissions, and how this will be measured.

Would like to see inclusion of accessibility standards within development principles so that West Edinburgh is genuinely inclusive and accessible to all. This would include elements like fully lit active travel routes, adequate disabled parking provisions and strict adherence to the Edinburgh Street Design Guidance.

As this development is sandwiched between two existing AQMAs (St Johns Road and Glasgow Road) design principles should include improvements of air quality so that any development and planning actively works to reduce air pollution impacts. Sites H59 - H63 in West Edinburgh are not required to submit air quality assessments. CCC would prefer all developments to include these assessments, especially in West Edinburgh.

#### Anna Goodwin (0302)

The wording of the strategy commonly uses ‘should’ when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say ‘must’.

#### Simon Thompson (0248)

A proportion of the sites in West Edinburgh may come forward in the next 10 years but this is not backed up by any detailed assessment or justification. Indeed, a large part of the West Edinburgh proposal is identified as an Area of Economic Importance as it was considered of national economic importance by the Scottish Government.



### Edinburgh World Heritage (0339)

The wording of bullet point 4 needs to be rephrased to reflect the importance of this area on the World Heritage Site and to ensure clarity that this is to be covered or enhanced (not simply 'the impact considered' which is unclear). Subject to the above change we support this section and look forward to engagement to advise on the developing masterplan/strategies.

### **H59: Land at Turnhouse Road (SAICA)**

#### SAICA (0590)

Confirms the availability and suitability of the subject brownfield site to deliver significant development early within the forthcoming plan period, providing explicit support for high density residential-led mixed use development (1,000+ units) via City Plan allocation H59.

Objects to:

- The identification of any primary school site requirement – indicative/potential or otherwise – within our client's landholding (H59) - a dedicated school for the H60 Turnhouse Road / H59 SAICA allocations is simply not justified, as demonstrated by the submitted Education Assessment.
- The identification of a need for 5 primary schools to serve the West Edinburgh allocations (Place 16). It is calculated that likely only 3 new primary schools (possibly 2) would be required to service the wider West Edinburgh (Place 16) development pipeline, which is markedly different from the 5 new schools currently identified as being required.

#### Ryden LLP (0578)

Density, scale, height and massing should be encouraged at key transport nodes and interchanges to provide the most sustainable use of land at these key locations.

The indicative Map 24 – West Edinburgh includes a number of other community uses. A potential Primary School location on Site H59 1 x 7 class on a site of 1 hectare would take approximately 16% of the available site and could impact on total unit numbers delivered and high density built from around an important transport hub. The proposed siting of a new Primary School should be reviewed further and a full comparative analysis undertaken based on education requirements as well as design principles for placemaking and most efficient patterns of use of land.

#### Genna Spears (0081)

Insufficient local infrastructure for additional housing.

### **H60: Turnhouse Road**

#### Cramond & Barnton Community Council (0243)

Proposals for housing-led development on this site should be reviewed. The industrial site contains a substantial number of viable commercial and service businesses which contribute to the City's economy, employment and local services. The potential impact on

these businesses of displacement, or other impacts of the designation of this site for housing-led development should be fully assessed prior to it being included within City Plan 2030.

Not confident that the Council will deliver travel infrastructure, education and other services to scales and timing fully compliant with 'infrastructure first' principles, or that traffic assessments and management measures, including actions to deter commuting and reduce car mileages, will adequately mitigate the impacts on communities neighbouring the A90 and A8 roads into the City from the impacts of traffic generated by all West Edinburgh developments and current and future traffic flows from West Lothian and Fife.

Mrs Patricia Stott (0349)

This is an operational industrial, commercial and service business site. Redevelopment for housing is likely to have an impact on these existing businesses, the employment they provide and their contribution to the City's economy. Displacement of such businesses would be contrary to the 20 minute neighbourhood principles.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Genna Spears (0081)

Insufficient local infrastructure for new housing.

**H61: Crosswinds**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Delete proposal H61 Crosswinds

H61 is identified in the Proposed LDP to deliver 2,500 homes by 2032. There is an application for Planning Permission in Principle for the site which is now subject to planning appeal. The Planning Statement that supports the PPP application confirms that:

Up to 2,500 new housing units are proposed for the site in a mix of 1, 2 and 3-bedroom apartments to be delivered over a 25-year programme. Phase 1 (years 1-6) is anticipated to deliver 358 new homes. The Planning Statement estimates that by 2032 approximately

1,000 units could be delivered (paragraph 7.95). That document was prepared in July 2020 and identifies significant infrastructure requirements as part of Phase 1. If approved by the Scottish Ministers in 2023, the lead in time to secure approval of matters specified in conditions and infrastructure consents would be 2025 at the earliest. It would therefore appear that Phase 1 may only complete around 358 homes by 2032.

NPF 3 identifies strategic airport enhancements as a National Development. Proposal H61 Crosswinds is located within the strategic airport enhancements boundary. NPF 3 clearly states that development at this location should be for the construction of buildings for business, general industrial or storage and distribution use requiring a near airport location where the gross floor space is or exceeds 10,000 square metres or the development is or exceeds 2 hectares in the area identified for associated business development. Other uses such as housing within the strategic airport enhancements boundary are not appropriate.

SESplan (2013) identifies that ...the Masterplan for Edinburgh Airport sets out a programme of future growth including the potential development of a second runway (paragraph 40). The Edinburgh Airport Masterplan 2016 – 2040 (November 2016) identifies Proposal H61 Crosswinds for supporting ancillary facilities shown Map 2 2025 Indicative Land Use.

Until such time as NPF 4 confirms the status of Proposal H61 Crosswinds as part of the strategic airport enhancements, National Development and the Edinburgh Airport Masterplan is revised, City Plan 2030 is required to accord with the requirements of NPF 3 and SESplan (2013).

#### Ratho and District Community Council (0289)

The new World Health Organisation recommendation for maximum noise level over areas where new development is proposed should be implemented.

The Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.

#### Simon Thomson (0248)

Reduce site capacity: Sites in West Edinburgh collectively comprise over 11,000 units. This scale of development is not achievable in the plan period given the extensive infrastructure requirements set out in the plan for new town centre, schools and roads.

#### Inverdunning (Hatton Mains) Ltd (0427)

Amend unit numbers – not wholly deliverable within plan period. There is also currently a live planning appeal.

Allowing for planning (master planning), construction and infrastructure lead-in times, completions may be achievable by 2024/25. This would provide c.5 years for the sites to contribute and given the housing product would be high density flatted development, it would require developers to build and sell significant numbers of a similar product per annum. Could contribute 1,000 units each at most. Proposed phasing in the Design Statement supporting planning application ref.20/03219/PPP notes up to 358 residential

units in Phase 1 (Years 1-6) and a further 822 residential units in Phase 2 (Years 7-16). In this respect, 1000 units as a contribution to City Plan 2030 would still be generous.

Proposals illustrate high density 5-10 storey flatted development. The implementation of over 11,000 flats in the vicinity of the Airport/Gogar Roundabout will be in addition to 2,085 units (houses/flats) at the existing Maybury allocation HSG19 immediately to the north, 1,350 units (650 houses/700 flats) at the Garden District site immediately to the south (Section 75 now approved) and 1,737 units (flats) at the existing Edinburgh Park mixed-use site Del4. There are also a further 500 units proposed via a current application at West Craigs North and redevelopment of the Gyle Centre to include flatted development currently the subject to community consultation. The result is over 17,000 homes proposed which will feed into the Gogar Roundabout/Maybury junction.

#### Edinburgh Airport Noise Advisory Board (0691)

World Health Organisation "Environmental Noise Guidelines for the European Region" state that: "For average noise exposure, the Guideline Development Group, GDG, strongly recommends reducing noise levels produced by aircraft below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects.

This being the case, EANAB consider that proposed residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport which presently includes the majority of the proposed developmental areas between Edinburgh Airport and the A8 corridor.

Renfrewshire Council's Local Development Plan (2014) has a strong policy on aircraft noise: "Noise Applications for residential development under or in the vicinity of aircraft flight paths, where noise levels in excess of 57dB (year 2011 Actual Annual LAEQ contours) are experienced (see figure 2), will be refused due to the inability to create an appropriate level of residential amenity and to safeguard the future operation of Glasgow Airport. These noise levels will be reviewed periodically, in line with the Local Development Plan and will take into consideration the most up to date published noise contours". - We consider that City Plan should have a similarly worded noise policy (with a lower noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

#### Genna Spears (0081)

Insufficient local infrastructure to support levels of additional housing.

#### Crosswinds Developments Ltd (0184)

Notwithstanding the current master plan for the site developed by CDL which shows a potential alignment for a diverted Gogar Burn and there is a current application awaiting determination by Scottish Ministers, it is CDL's view that this policy (Env 35) requirements when set alongside requirements for 20% open space, 35% affordable housing, housing densities of 65 units per Ha, etc would, when taken as a whole, potentially preclude the efficient development of this brownfield site.

#### West Craigs Limited (0472)

Support separate school provision at H61

## **H62: Land adjacent to Edinburgh Gateway**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Proposal was not identified as a housing led development in relation to Choice 12 in the MIR. As shown on Map 11 – Area 2 West Edinburgh: the site is identified as employment land. Choice 14 Delivering West Edinburgh identifies that the two potential changes being:

- Remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses.
- Allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange.

It therefore cannot be included in the Proposed LDP as a housing proposal as it has not been subject to public consultation at a formative stage in the process.

NPF 3 identifies strategic airport enhancements as a National Development. The proposal is located within the strategic airport enhancements boundary. NPF 3 clearly states that development at this location should be for the construction of buildings for business, general industrial or storage and distribution use requiring a near airport location where the gross floor space is or exceeds 10,000 square metres or the development is or exceeds 2 hectares in the area identified for associated business development. Other uses such as housing within the strategic airport enhancements boundary are not appropriate. Until such time as the NPF 4 does or does not identify Proposal H62 as part of the strategic airport enhancements National Development, City Plan 2030 is required to accord with the requirements of NPF 3.

### West Craigs Limited (0472)

Increase site capacity. Have undertaken a significant amount of preliminary technical work to inform ongoing pre-application discussions with CEC regarding our proposals for the site (pre app ref: 20/02601/PREAPP). This has included master planning, noise modelling, landscape assessment, and transportation assessment. This work to date indicates that the site would be capable of accommodating c. 500 units. Allocating the site for higher density development would be compliant with the overall principles of City Plan 2030, which seeks to locate high density development in highly accessible locations.

Considering potential land uses for the triangle site within H62 located immediately west of the Tram Depot. Given proximity to the Tram operations, it may be that residential development on this part of the site would be unfeasible on noise impact grounds. Some flexibility should be included within allocation H62 to be supportive of other uses.

The requirement for a Council-led masterplan should be removed from the text of Place 16 and replaced by a requirement for all development to demonstrate it would not jeopardise the development of any adjacent site. Recognise the importance of co-ordinated development within West Edinburgh but a significant amount of technical work has already been undertaken in respect of West Craigs' site at H62 and have demonstrated that the site can be delivered in the short term without jeopardising the development potential of any adjacent site.

Do not agree that it is appropriate to include H62 within the school provision area. H62 is located within close proximity to the proposed new Maybury Primary School, located to the north within the main West Craigs site. Connectivity between H62 and the school will be enhanced through the creation of a new active travel route over the railway line, via the pedestrian / cycle bridge consented under application 20/01148/AMC. Connectivity to Craigmount High School is also good and will be further improved by the new active travel route. Travel to both schools from H62 / West Craigs South can therefore be achieved in a safe and sustainable manner. It would therefore be appropriate to link any developer contributions for new school infrastructure arising from the development of H62 to Maybury Primary and Craigmount High.

#### Edinburgh Airport Noise Advisory Board (0691)

World Health Organisation "Environmental Noise Guidelines for the European Region" state that: "For average noise exposure, the Guideline Development Group, GDG, strongly recommends reducing noise levels produced by aircraft below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects.

This being the case, EANAB consider that proposed residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport which presently includes the majority of the proposed developmental areas between Edinburgh Airport and the A8 corridor.

Renfrewshire Council's Local Development Plan (2014) has a strong policy on aircraft noise: "Noise Applications for residential development under or in the vicinity of aircraft flight paths, where noise levels in excess of 57dB (year 2011 Actual Annual LAEQ contours) are experienced (see figure 2), will be refused due to the inability to create an appropriate level of residential amenity and to safeguard the future operation of Glasgow Airport. These noise levels will be reviewed periodically, in line with the Local Development Plan and will take into consideration the most up to date published noise contours". - We consider that City Plan should have a similarly worded noise policy (with a lower noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

#### Crosswind Developments Ltd (0184)

Question the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG. This is a process point rather than a principle point and we are concerned that limited transparency of the process will undermine the outcomes noted in the plan. For example it is noted that this change of emphasis from economic development to housing led development is contrary to the current National Planning Framework (NPF3).

#### **H63:Edinburgh 205**

Murray Estates (0197), SEEDCo (0198), Persimmon Homes (0495), Taylor Wimpey (0200), BDW Trading (0350), Robertson Residential Group Limited (0490)

Object to aim 10 – 'delivering key economic land use needs through housing led mixed use development' – specifically reallocation of strategic business land at Edinburgh 205 to

housing. Do not consider that re-allocating approximately 400 active businesses and strategic employment sites for housing will deliver Edinburgh's key economic land use needs.

The re-allocation of strategic business sites at the International Business Gateway (Edinburgh 205) and Edinburgh's Bioquarter to housing (9,500 homes combined) was not even identified as a 'choice' at the Main Issues Report stage of the City Plan.

Murray Estates (0197), SEEDCo (0198), Persimmon Homes (0495), Taylor Wimpey (0200), BDW Trading (0350), Robertson Residential Group Limited (0490), Stewart Milne Homes (0118)

Re-allocating approximately 400 active businesses and strategic employment sites (including land at Edinburgh 205) for housing will not deliver the outcome 'A city where everyone shares in its economic success'.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Proposal was not identified as a housing led development in relation to Choice 12 in the MIR. As shown on Map 11 – Area 2 West Edinburgh: the site is identified as employment land. Choice 14 Delivering West Edinburgh identifies that the two potential changes being:

- Remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses.
- Allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange.

It therefore cannot be included in the Proposed LDP as a housing proposal as it has not been subject to public consultation at a formative stage in the process.

In accordance with SESplan policy 2, the Council is required to demonstrate that adopting the mixed use development strategy at strategic employment sites will not result in a net loss to the overall strategic land supply. Proposal is part of IBG which is required to maintain 85 hectares of strategic employment land. The Council has not demonstrated whether or not that supply of employment land will be maintained in the Proposed LDP.

NPF 3 identifies strategic airport enhancements as a National Development. The proposal is located within the strategic airport enhancements boundary. NPF 3 clearly states that development at this location should be for the construction of buildings for business, general industrial or storage and distribution use requiring a near airport location where the gross floor space is or exceeds 10,000 square metres or the development is or exceeds 2 hectares in the area identified for associated business development. Other uses such as housing within the strategic airport enhancements boundary are not appropriate. Until such time as the NPF 4 does or does not identify Proposal H62 as part of the strategic airport enhancements National Development, City Plan 2030 is required to accord with the requirements of NPF 3.

West Craigs Limited (0472)

Support separate school provision at H63

Ratho and District Community Council (0289)

The new World Health Organisation recommendation for maximum noise level over areas where new development is proposed should be implemented.

The Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.

Stirling Developments Limited (0303)

7000 units on what appears to be a greenfield site that was not identified through the Choices document. The plan needs to offer flexibility to support effective greenfield sites should the supported brownfield sites fail to deliver. Sites like Calderwood, which was identified in Choices is further supported by the City Deal and NPF4. Effective sites like Calderwood should be supported within City Plan as Calderwood has the ability to deliver homes of all tenures in a 20 minute neighbourhood.

Inverdunning (Hatton Mains) Ltd (0427)

Amend unit numbers – not wholly deliverable within plan period. There is currently a live planning appeal.

Allowing for planning (master planning), construction and infrastructure lead-in times, completions may be achievable by 2024/25. This would provide c.5 years for the sites to contribute and given the housing product would be high density flatted development, it would require developers to build and sell significant numbers of a similar product per annum. Could contribute 1,000 units each at most.

Site is allocated for 7,000 units on a 72 hectare gross site (averaging 97dph across the whole site). The IBG1 site proposal provides for 211,511 m<sup>2</sup> of mixed-use space on a 36.7 hectare site (of which 43,576m<sup>2</sup> is for residential, equating to 396 flats at an average 110m<sup>2</sup>). Based upon a similar masterplan approach, this equates to 5,762 m<sup>2</sup> of floorspace per hectare. Whilst an approximate density guide, if applying this rate to H63, this would provide for 415,000 m<sup>2</sup> of floorspace. This equates to around 4,000 flats at an average of 100m<sup>2</sup>. This indicates that either the H63 site would require to be significantly higher density to achieve 7,000 units (notwithstanding the site is within an Area of Economic Importance and a significant amount of floorspace should be for commercial uses) or the number is incorrect.

The implementation of over 11,000 flats in the vicinity of the Airport/Gogar Roundabout will be in addition to 2,085 units (houses/flats) at the existing Maybury allocation HSG19 immediately to the north, 1,350 units (650 houses/700 flats) at the Garden District site immediately to the south (Section 75 now approved) and 1,737 units (flats) at the existing Edinburgh Park mixed-use site Del4. There are also a further 500 units proposed via a current application at West Craigs North and redevelopment of the Gyle Centre to include flatted development currently the subject to community consultation. The result is over 17,000 homes proposed which will feed into the Gogar Roundabout/Maybury junction.

Simon Thomson (0248)



Reduce site capacity: Sites in West Edinburgh collectively comprise over 11,000 units. This scale of development is not achievable in the plan period given the extensive infrastructure requirements set out in the plan for new town centre, schools and roads.

#### Edinburgh Airport Noise Advisory Board (0691)

World Health Organisation "Environmental Noise Guidelines for the European Region" state that: "For average noise exposure, the Guideline Development Group, GDG, strongly recommends reducing noise levels produced by aircraft below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects.

This being the case, EANAB consider that proposed residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport which presently includes the majority of the proposed developmental areas between Edinburgh Airport and the A8 corridor.

Renfrewshire Council's Local Development Plan (2014) has a strong policy on aircraft noise: "Noise Applications for residential development under or in the vicinity of aircraft flight paths, where noise levels in excess of 57dB (year 2011 Actual Annual LAEQ contours) are experienced (see figure 2), will be refused due to the inability to create an appropriate level of residential amenity and to safeguard the future operation of Glasgow Airport. These noise levels will be reviewed periodically, in line with the Local Development Plan and will take into consideration the most up to date published noise contours". - We consider that City Plan should have a similarly worded noise policy (with a lower noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

#### SEEDCo (0198)

Proposal should be removed from the Plan until such time as it has undergone proper assessment and consultation: The Proposed City Plan departs from all of the housing delivery options identified in Choices. It does not allocate Area 1 or any of the other greenfield Areas identified in Options 2 and 3. Nor does it restrict the housing allocations to the brownfield sites identified in Option 1 of page 33 of Choices. Instead, Option 1 has been supplemented to allocate greenfield housing sites at the previously undeveloped employment allocations at the IBG (Edinburgh 205) and Bioquarter for housing. Therefore, neither of these proposals were subject to consultation at the MIR stage. We object to the process by which the decision has been taken by the Council to re-allocate these greenfield sites for predominantly residential development without consultation.

#### Corstorphine Community Council (0799)

Edinburgh 205 site seems to be an anomaly in the noise impact assessment requirement, in that all the others will require one but that site only 'may' require. CCC would prefer all strategic development sites to include impact assessments for noise.

#### West Town Edinburgh Ltd (0660)

Support noted.

## **Place 17: Edinburgh Airport**

### Edinburgh Airport Limited (0761)

Place 17 places emphasis on the development and enhancement of Edinburgh Airport within the operational boundary and in accordance with the approved masterplan - no airport boundary is shown on the proposed Proposals Map and if this is specifically referred to in Place Policy 17, an up to date boundary should be shown. Currently, the only boundary for the airport is 'Areas of Economic Importance' which also includes sites H61, H62 and H63 and therefore, cannot be identified as the airport boundary which will guide future development when land is included which is not in their ownership. It is also not clear whether this refers to the collaborative masterplan as identified in Place 16 (page 71) or the airport's internal masterplan. The requirement of a masterplan is considered restrictive in both scenarios and it is considered that this should be removed as a requirement from Place Policy 17.

Given the nature of the airport, it is not appropriate or possible to include the provision of open space as part of a new development within the operational boundary. A degree of flexibility is required to the policy to allow the requirement to be assessed on a case by case basis. - The wording should be amended.

The West Edinburgh Strategic Design Framework is significantly out of date and circumstances with both the Airport and West Edinburgh have changed since the WESDF. It is therefore should not be relied on as a consideration for Place 17.

### Lord Dalmeny (0475)

Place 17 confirms that the development and enhancement of Edinburgh Airport will be supported within the airport boundary defined on the Proposals Map and the approved, or subsequently approved, master plan.

Land in the ownership of Lord Dalmeny to the north of Lennymuir at Turnhouse is included within the current Edinburgh Airport Masterplan as being within the future airport boundary. However, the land is not included in the designation of Area of Economic Importance associated with Edinburgh Airport but is included within the 'Countryside' policy designation. This would be prejudicial to any future expansion ambitions for the airport at this location. This land should be removed from the Countryside designation and be incorporated into the specific policy provision that identifies Edinburgh Airport as an 'Area of Economic Importance'

### Mr Roger Thomas (0345)

Given the climate emergency and the green ambitions of Edinburgh Council, no airport expansion should be countenanced. Instead of meeting air passenger growth forecasts, the Council and Scottish Government should be pursuing policies which reduce the demand for flying by the facilitation of faster rail journeys to English destinations and throughout the Scottish mainland.

### Frances Guy (0589)

Remove all commitments to airport expansion - airport expansion is incompatible with reducing carbon emissions.

Robert Falcon (0640)

Safeguarding land for future airport expansion should be removed from the plan and rejected as a policy principle. Any increase in air travel should be rejected as it runs counter to the Council's stated environmental

SEPA (0012)

Would like more detail on this 'Place'. While Place 17 (Edinburgh Airport) is separate from Place 16 (Crosswinds) EMP4 combines them in one site. It should be clarified if they are separate sites or a combined site.

A detailed FRA which informs site design is required in order to ensure that there is no associated increase in flood risk outwith the site and to ensure that there is no unacceptable flood risk for future uses of the site. This site could incorporate the Gogar Burn diversion scheme, which could have implications for the layout and design of the development. Should development go ahead without a wider understanding of the catchment, there is a risk that the Gogar Burn realignment, which would deliver multiple benefits, may be jeopardised. Should the Gogar Burn not be realigned, this may affect the developable area as well. Multiple small drains and watercourses all require assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

Cockburn Association (0777)

Not Supported subject to: Clarification of the mitigation measures which will address the negative environmental impacts identified in the Strategic Environmental Assessment Environmental Report.

L Gunstensen (0663)

Following a representation at the Main Issues Report (Choices) stage on the inclusion of a second runway at Edinburgh Airport in the Plan, the response of the Council was that "the proposed runway does not form part of the MIR/Proposed Plan". However, Proposed Plan policy Place 17 (page 76) includes the following text: "Land to the north of the existing airport boundary is safeguarded to provide a second main parallel runway, if required in the future, to meet air passenger growth forecasts...Proposals which would prejudice the long-term expansion of Edinburgh Airport will not be supported." In addition, the SEA Environmental Report (ER) assesses some, but not all, effects of the provisional second runway (page 68). If the second runway does not form part of the Proposed Plan, then it is unclear why it forms part of policy Place 17, it appears on the proposals map and there is (partial) discussions of the effects included in the ER. CEC have advised (verbally) that they make a distinction between a safeguard and a proposal. However, this is not clear anywhere in the Plan and clarification is required as to the level of support a 'safeguard' would give to an application for a runway, were one to come forward.

Strategic airport enhancements are no longer National Developments in the draft NPF4, so it appears support is likely to be removed at the national level. There is therefore no longer a current higher tier assessment, nor is there any lower level assessment (Edinburgh Airport's Masterplan is not subject to SEA), so it is essential that the development is properly assessed at the local plan stage.

Esme Clelland (0778)

The Scottish Government has declared a climate emergency and there is an urgent need to address emissions. As noted in the plan The Climate Change (Scotland) Act 2019 Act sets targets of 75% reduction in emissions by 2030 and net-zero emissions by 2045 - The safeguarding of the second runway should not be included in the plan.

Jamie Wallace (0167)

Becoming a sustainable and net zero city is one of the 3 key drivers / main areas for change in the City Plan 2030. The city has a very ambitious net zero by 2030 target. Therefore no expansion of the airport should be permitted unless it can be demonstrated that it will not undermine achievement of these outcomes.

Hallam Land Management (0615)

This policy was subject to a motion of dissent by the Green Party at the LDP meeting and therefore is not the settled view of the Council.

Place 17 is not aligned with the West Edinburgh Development Strategy or other Place Policies for West Edinburgh. It potentially prejudices the Council's wider aspirations for housing and economic growth in the West Edinburgh and A8 Newbridge Corridor. Land to the north of the airport for a second parallel runway is identified without rationale, justification or any travel forecasts that are relevant and up to date. The related safety zone of a second runway could seriously impact the operational and development potential of the Craigiehall site. Policy is initially predominantly concerned with land within the airport boundary. The northern runway proposal is not supported by any form of environmental assessment through SEA or Choices. A safeguarding policy has therefore not been prepared or consulted upon.

Strategic Environmental Assessment conducted on site options are unclear regarding noise issues. Hallam reserves the right to rebuttal through specialist advice if necessary, as part of the Examination.

Edinburgh Airport Noise Advisory Board (EANAB) (0720)

It is not clear whether the second runway at Edinburgh Airport (p.76) is actually supported by the Plan, or merely the land safeguarded. The additional noise impact of the second runway, on both existing and proposed residential areas, should be taken into account in the Environmental Report should the Plan support the development.

If the Plan is to support development of a second runway, it is important that the impacts on human health through noise pollution and residential amenity are properly assessed, even at the Plan stage.

It is likely that if air traffic at Edinburgh Airport were to increase to the extent that a second runway could be justified, this would be incompatible with the Government's intention that the aviation industry as a whole should be 'carbon neutral' by 2050.

RSPB (0648)

Do not support plans for a second parallel runway at Edinburgh airport that will enable an increase in flights to and from Edinburgh. This is not consistent with other climate change and sustainability policies within the City Plan 2030.

Anna Brand (0742)

Prioritising the development of an airport is at odds with a climate emergency.

Spokes Lothian (0545)

Spokes does not support expansion of airport capacity. In addition to that major and over-riding objection, the proposed second runway site would compromise the Newbridge / Kirkliston / Dalmeny cycle route whilst also increasing carbon emissions and unsustainable transport.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

**Place 18: Gogarburn**

NatWest (0477)

NatWest supports Place 18 RBS Gogarburn and welcomes the recognition of the importance of Gogarburn to Edinburgh's economy and financial sector. Welcomes the support Place 18 (and Table 13 – Areas of Special Economic Importance) provide to opportunities for further office and ancillary development within the boundary of the site.

SEPA (0012)

A detailed FRA which informs site design is required in order to ensure that there is no associated increase in flood risk outwith the site and to ensure that there is no unacceptable flood risk for future uses of the site. This site could incorporate the Gogar Burn diversion scheme, which could have implications for the layout and design of the development. Should development go ahead without a wider understanding of the catchment, there is a risk that the Gogar Burn realignment, which would deliver multiple benefits, may be jeopardised. Should the Gogar Burn not be realigned, this may affect the developable area as well. Multiple small drains and watercourses all require assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

**Place 19: Edinburgh Park/South Gyle.**

Mark Ockendon (0419)

It is significantly quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life), whilst recognising that we live in Scotland, which is windy and rainy. Modes of transport that are warm and protected from the elements will continue be required in this country.

We should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Hallam Land Management (0615), Tarmac (0244)

The entire Edinburgh Park/South Gyle site was identified in Choices as a 'Strategic Office Location'. Now shown on Proposed Plan page 27 map as a 'Housing Led Development'. Choices made no reference to specific housing allocations within the South Gyle site. LDP 2016 made no mention of residential use in areas EP3 to EP5. LDP 2016 identified an opportunity for 450-700 units across the South Gyle site, the Proposed Plan has now increased this, without justification, to 1,737 units.

Redline Planning Services Ltd (0673)

The Proposed LDP sets out that the Council's vision is to change the character of this area over time from a business dominated environment with limited evening activity to a thriving mixed use and well integrated part of the city (paragraph 3.64). Place 17 establishes that planning permission will be granted for development which maintains the strategic employment role of the area and introduces a wider mix of uses. Various key requirements are set out to achieve this, including part c) which states that housing will be acceptable in principle "as a component of business-led mixed-use proposals". This requirement sits at odds with the vision to introduce a mix of uses to the area, and in particular in those locations which are already characterised by office development. In such locations, other uses (including housing) should not have to be a component of business proposals but should be able to stand on their own.

Tesco Personal Finance PLC has a 4.3 ha landholding at 2 South Gyle Crescent, Edinburgh. This is occupied by the headquarters of Tesco Personal Finance, associated parking and vacant land. The existing 10,167 sq.m office and 215 space car park was approved by the City of Edinburgh Council in May 2006 (ref. 05/02513/FUL). Permission was later approved for additional phases of office development on land around the Tesco

bank site. These were not however built out and have since lapsed. Tesco can confirm that they no longer have any intention of developing offices on this land, and that the parcels are surplus to their requirements. Tesco therefore propose to dispose of these sites and have entered into an agreement with a housebuilder (Barratt Homes) to take forward alternative residential development proposals.

The housebuilder has advanced their development proposals for the site and has undertaken pre-application consultation for the development of 300 new homes including affordable housing, retail, commercial space and a nursery. It is anticipated that a planning application for this development will be lodged in 2022.

#### BDW Trading (0350)

Object to the non-allocation of surplus land adjacent to Tesco Bank for housing-led development. Amend part c of Place 19. This amendment will not undermine the policy intent to retain the strategic business function of the South Gyle area but allows appropriate flexibility to deal with individual applications that in themselves do not comprise predominantly business uses.

Map 26 refers to "business-led redevelopment" in areas EP3 & EP4. The subject site is in area EP4. Recommend that EP4 is distinguished from EP3.

#### Pawel Stankiewicz (0445)

New paragraphs should be added :

- 1) "Area up to 100 m from Edinburgh bypass is not used for housing." To avoid people living in polluted areas.
- 2) "Tram stops and railway stations are focus points of footpaths coming to them diagonally across urban blocks in case of their (re)development." - In the case of square urban blocks, diagonal routes cut walking distance up to 30 %.

#### SEPA (0012)

The requirement for a flood risk assessment (FRA) is made in 3.65b and we support this. FRA required to assess risk from the Gogar Burn and Stank Burn and any tributaries that feed into these watercourses. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Nearby areas susceptible to both fluvial and surface water flooding. Surface water flooding reported regularly along South Gyle Broadway.

#### Living Streets Edinburgh Group (0486)

There is an opportunity to change the focus from private cars to people. Reference to enhancement of active travel is noted, but the Council should be more radical in capitalising on the excellent public transport infrastructure that exists by enhancing it, removing as much car parking as possible and making pedestrian movement the focus of future place making development of this area.

#### Ambassador Group (0683)

Support the identification of South Gyle (part b.) and commercial centres (part d.) as appropriate locations for office development.  
Requirement h.) / development principle c). increased permeability will be dependent on individual sites and applications coming forward.

Shelborn Edinburgh Limited (0732)

Support Place Policy 19, it encourages the ongoing development of the Edinburgh Park/ South Gyle area to create a thriving, mixed use and well integrated part of the city. The Edinburgh Park/ South Gyle area is a key employment site which is transitioning into a mixed use neighbourhood with increasing levels of residential use. Should update the map associated with the Development Principles to reflect the developments that have been consented, or are proposed, for the area.

Sherborn support the densification of the area by using undeveloped and under-used land. Given the highly accessible nature of the Edinburgh Park/ South Gyle area. Place 19 should be developed further to make reference to the fact that the area can support a higher density of development. The Council should support the redevelopment of sites in the area that are reaching the end of their operational life and becoming obsolete.

Parabola Edinburgh Limited (0723)

supportive of the Proposed Place Policy 19 as it encourages the ongoing development of the Edinburgh Park / South Gyle area to create a thriving, mixed use and well integrated part of the city.

Support the densification of the existing Park by using undeveloped and under-used land. Given the highly accessible nature of the Edinburgh Park / South Gyle area, Place 19 Policy should be further developed to make reference to the fact that this is an area of the city that can support a higher density of development.

Archie Clark (0003)

Page 77 Under Place 19, the Plan refers to “improved pedestrian and cycle links through the site and to provide .. connections with .. in the surrounding area including the potential to create a strategic pedestrian/cycle route linking Wester Hailes, Broomhouse and Sighthill to Edinburgh Gateway Station, as part of the wider West Edinburgh Active Travel Network (WEL)”– notwithstanding the desirability of this, what is the level of demand for this? Will this provision be matched by public transport?

Page 77 The Plan states, “Adoptable roads to be brought up to standard and an Internal CPZ...”, with no explanation of what CPZ is (Controlled Parking Zone?). Is this intended to provide income to the City?

Page 79 “EP2 is complete”– please show location of EP2 on the plan.

Corstorphine Community Council (0799)

Should include accessibility standards within development principles so that West Edinburgh is genuinely inclusive and accessible to all. This would include elements like



fully lit active travel routes, adequate disabled parking provisions and strict adherence to the Edinburgh Street Design Guidance.

Support the shift of Edinburgh Park to a more vibrant, mixed-use area, there is nothing in the way of healthcare and primary educational facilities designed for this development. While proposed housing is close to amenities such as Hermiston Gait and Edinburgh Park train station, CCC fails to see how this development meets the requirements for a 20 minute neighbourhood. There are no amenities such as doctors' surgeries, dentists or primary schools that are easily accessible from this area.

While the West Edinburgh development principles address sustainable transport extensively, the design principles for Edinburgh Park/South Gyle don't really mention public transport. None of the EP Development Principles include the proposed orbital bus provision - this should be included so that access to enhanced public transport is enshrined in the Principles.

#### Royal Mail Group Limited (0501)

The Royal Mail assets listed (including 21 South Gyle Crescent in Place 19) are all allocated for residential development. These properties are important assets for Royal Mail and there is no short, medium- or long-term interest or intention in relocating the Delivery Offices to an alternative location. The housing allocations proposed at each of these sites are therefore not considered to be deliverable and should be removed from the emerging Local Development Plan. Proposed housing would also not be compatible with Royal Mail operations in terms of potential noise and disturbance to residents.

#### Genna Spears (0081)

This extra housing without any extra local services being added is going to even more pressure on overloaded services. Insufficient capacity in Schools, GPs, Dentists.

#### Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

#### APAM / Bankfoot APAM (0355)

Support noted.

### **Place 20: Royal Highland Centre**

#### Creos Property Limited (0253)

In principle, Creos are supportive of the Place Based Policies as they promote development on, and immediately adjacent to, the site in their ownership.

It is not currently clear how multiple Place Based Policies will apply to sites, and what Policy should take priority, therefore an explanatory note, or clarification on this point within the Proposed Plan, would be welcomed.

The Royal Highland Centre Policy is potentially restrictive in terms of what proposals can come forward, as the Policy seeks to link development in the area to “the primary activity of the RHC”. Clarification on this requirement would be helpful, as it is inappropriate to restrict proposals on land that is not in the ownership of RHC. Creos would encourage the Council to reconsider the wording of this Policy, to ensure that development is not inhibited by its requirements and would suggest that this could be updated to state that proposals should support the primary activity of the RHC or that applicants in the area should engage with the RHC at an early stage of development projects to understand their interests.

Taylor Wimpey and Hallam Land Management Ltd (0603)

The safeguard for the possible relocation of the RHC should be removed from City Plan 2030: Under Choice 14 (B) in the Choices for City Plan 2030 document, the Council proposed to remove the safeguard on the site to allocate it for other uses “We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses.”. The proposed plan retains the existing LDP allocation to safeguard the site despite the evidence showing that this is highly unlikely to be required. The reasons given in the supporting text is that it has been safeguarded “in accordance with National Planning Framework 3”. The Scottish Government has now published the Proposed National Planning Framework 4 (NPF4) which changes the national policy direction for the site. Proposed NPF4 is seeking to remove Airport Enhancements, including the Edinburgh Airport Expansion, from its list of National Developments. This would remove the national policy constraint requiring the land at Norton Park to be safeguarded for the potential relocation of the Royal Highland Centre.

There continues to be a need to provide new housing and other uses on a significant scale to serve the city and city region. The current safeguarding of land at Norton for the possible relocation of the RHC constrains a site with clear potential for a more intensive and practical use within the city. Removal of the safeguard provides the opportunity to deliver a sustainable residential-led mixed-use development which would help meet housing need and demand.

Housing proposals which come forward through Policy Hou 4 - Housing Land Supply must deliver optimal densities taking into account the site characteristics, location and surrounding area. - The Site at Norton Park benefits from being situated close to excellent existing and planned public transport infrastructure (including the tram extension from Ingliston and the surrounding area) which could deliver a high-density development. As shown in the Development Framework and Vision Document submitted with these representations, the site proposes an Urban Core which could support a range of high-density mixed uses including residential development.

Royal Highland & Agricultural Society of Scotland (0482)

Supports specific reference in West Edinburgh policy framework in Place 20 Royal Highland Centre but suggests that the detailed wording is amended to reflect a masterplan

approach to maintain longer term flexibility across the site and planning status based on current land uses and to define precise boundaries to include the Young Farmers field to the north of Fairview Road for completeness. This site lies between extant planning permissions for hotels and mixed uses and should form part of the wider showground masterplan approach to development.

This would also be consistent with the aims and terms of Policy Econ 6 – Hotel Development reference to ‘within the boundaries of the Royal Highland Centre’

The site is owned and utilised by RHASS and its omission is an anomaly.

The masterplan prepared in connection with the previous planning application provides the context for development but it remains unapproved. Reference within City Plan should therefore reflect that and provide the flexibility to promote a masterplan approach to development without having to re-engage with a formal planning application process sitewide where land uses are already well established.

RHASS supports the core approach of brownfield preferred allocations for housing and supporting restraint on further greenfield release. The site initially suggested as an alternative housing allocation at Norton Park is not supported and RHASS supports its removal.

Supports that the Land at Norton Park as shown on the Proposals Map is safeguarded for the future relocation of the RHC and its development as Scotland’s National Showground. The site of the Royal Highland Centre may be required for airport uses in the long term to meet air passenger growth forecasts.

#### SEPA (0012)

Uncertain that the principles for this Place are being clearly established. While it appears that the purpose of the Place is to protect the existing Royal Highland Centre, it appears, that should it be required, the airport will use it for expansion. This should be clarified or confirmed.

Reference is made to flood management and we agree that this needs to be a major consideration when considering any re-development of this site.

#### Mr Roger Thomas (0345)

p. 79: Place 20, Royal Highland Centre: "The policy also safeguards the site for the long-term expansion of Edinburgh Airport ...."

Given the climate emergency and the Council's green ambitions, the City Plan should not be catering for an expansion of Edinburgh Airport. This item should therefore be removed.

#### Anna Goodwin (0302)

The wording of the strategy commonly uses ‘should’ when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say ‘must’.

## **Place 21: Riccarton University Campus and Business Park**

### Heriot Watt University (0468)

Support proposed Policy Place 21 but suggests additional wording to reflect current campus developments and evolving estates strategy as part of the updated 2021 Masterplan Framework. The Masterplan provides strategic context for future investment and requires a flexible approach to its evolution. It is not required to establish land uses but is a tool for the university to capture and shape new development proposals across their estate. Surrounding land should remain allocated as green belt to protect the setting of the campus but also to allow for potential future long term expansion of sports and outdoor recreation facilities.

Specific wording and reference in Table 13 should clarify the chronology of masterplans with additional wording.

### Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

## **Place 22: Maybury**

### Mark Ockendon (0419)

It is significantly quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life), whilst recognising that we live in Scotland, which is windy and rainy! Modes of transport that are warm and protected from the elements will continue be required in this country.

We should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

### West Craigs Limited (0472)

While not a background document to the Proposed City Plan 2030, we consider the Housing Land Audit and Completions Programme 2021 is important in terms of setting out base rates of consented housing delivery in order to inform delivery throughout the City Plan 2030 period. With regards to HSG19 / West Craigs, the Programme's expected build out rates in the audit for Maybury Central (1,400 units – reference: 5246.2) is significantly lower than our own forecasts. We would request that the build out rates contained within the Housing Land Audit and Completions Programme 2021 are updated to reflect the existing position on the site.

### Rosebery Estate (Bankhead) (0618)

Place 22/HSG19 allocation has been subject to significant work and is now in the process of being developed out. Services have been installed with capacity for the anticipated numbers on the West Craigs and Rosebery Land. Neither the potential public transport proposal (Ref: WE12), nor the proposed allocation from which it arises (land adjacent to H61), were included in the Choices Consultation and this is a significant, unwelcome change to the plan which we have had no contact from the Council in respect of. The Council has not mentioned to the owner, or their agent, that they were considering imposing the landing point of a public transport corridor on to an allocated, recently serviced site with residential development in the process of being brought forward. This land is not available for the landing point of a potential public transport corridor and should be considered to have a landowner constraint and be removed as a viable option to be explored further at this stage. Under emerging Policy Env 2, this proposal may result in the refusal of consent for land adjacent to H61 as it would “compromise the effective development of adjacent ground”.

Support the continuation of the HSG19 site to the new LDP, but certain development principles should be deleted:

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

On page 80, Place 22, The introduction is not grammatical, “Planning permission will be granted for development within the boundary of Maybury as defined on the Proposals Map will be granted provided it accords with the Maybury and Development Principles and the approved, or subsequently approved, master plan.”

Archie Clark (0003)

LDP2016 HSG20 has disappeared from the map (Appendix 2b). A check needs to be made to ensure that other areas previously approved are included.

This site needs to be linked over the railway line to H61, H62 and H63 so that a more varied shopping experience can be obtained.

The proposed new footpath/cycle path appears to be inadequate, even though it may help to resolve the serious congestion that can be expected at the Gogar roundabout.

Living Streets Edinburgh Group (0486)

There is no reason why pedestrian priority and a largely car free development cannot be an underpinning principle. There is some reference to measures for pedestrians and active travel, but this is to counter the hazardous environment created by a car dominated development. Development should be expected to follow the same principles as proposed elsewhere in the city, designed accordingly and contributions secured to carry out the necessary enhancements to public transport, pedestrian and cycle infrastructure thereby reflecting the transport hierarchy. It is critical that the plan is consistent in reflecting Scottish Planning Policy and the National Transport Strategy throughout.

RSPB (0648)

Support text in section 3.68c, relating to the inclusion of a new 30m wide green network link is to be provided from new pedestrian/cycle bridge through the Maybury site to connect via Cammo Walk and Cammo Estate park to the north. This will provide a new, strategic, north-south green network link to the west of the city. No vehicular access should be taken through the green corridor.

Support sections 3.68j 'Provision of new woodland and grassland habitat (30m depth) to create a strong green belt boundary adjoining Craigs Road along the northern edge of the site.' And section 3.68k 'Provision of two new large greenspaces to meet the two-hectare green space standard as required by the Open Space Strategy. There is potential to create local green space on the high point of the site next to Maybury Road.'

#### Corstorphine Community Council (0799)

Item m junction improvements should also include reference to improvements for pedestrians and cyclists.

#### The Association for the Protection of Rural Scotland (0334)

APRS regrets the removal of this important countryside from the greenbelt in the ELDP of 2016. A clarification of its present/new status is required - is it now classified as Countryside, in which case green belt principles (or key elements) for development should still apply?

#### Maybury Development Principles

c.). The plan indicates landscaped areas in diagrammatic geometric shapes. To avoid misinterpretation, it is important to indicate such areas more accurately with 'naturalistic' shapes. Scattered small areas of trees, shrubs, green/blue open space throughout the area could substantially enhance the environment quality of the development.

d.). The proposal to improve the character of Turnhouse Road appears to be minimal and inadequate from the plan. There appears to be a dearth of street trees, small copses and green/blue areas scattered along its length. Will these deficiencies be addressed?

#### Pawel Stankiewicz (0445)

Paragraph f on page 80 should be: "Opportunity for higher density development within walking distance to tram halt and railway station within at least 1000 metres from the tram stop." - To increase the number of people living close to good public transport.

A paragraph should be added: "New footpath is provided running from pedestrian/ cycle bridge towards NNW." - In the case of square urban blocks, diagonal routes cut walking distance up to 30 %

#### SEPA (0012)

A flood risk assessment has been identified as principle for development of this Place, and we support this.

The realignment of the Gogar Burn was never proposed to go through this site. If the Gogar is to be re-routed through this site then that would require further work.

Cramond & Barnton Community Council (0243)

This development area should be omitted from Proposed City Plan as it is a legacy site from the previous LDP and a substantial proportion of the site is currently consented and under development.

Mrs Patricia Stott (0349)

This development area should be omitted from the proposed city plan as a substantial proportion of the site is already under development.

Genna Spears (0081)

Insufficient local infrastructure for additional housing.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

**Place 23: Builyeon Road**

Mark Ockendon (0419)

It is significantly quicker and easier to use a car for many journeys. Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life), whilst recognising that we live in Scotland, which is windy and rainy. Modes of transport that are warm and protected from the elements will continue be required in this country.

We should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience.

Archie Clark (0003)

Page 82, Place 23 Builyeon Road – This site (HSG32 and SCH10 in LDP2016), as shown in application 21/04019/AMC would produce a soul-less development of 840 houses, a primary school and limited workplaces. There is very little useable green space. With few onsite workplaces commuter and service traffic will be substantial. The latest designs have few 'community' facilities. Site will be affected by the noise of traffic on the Forth Bridge approach road requiring a 'substantial landscaped buffer' to "mitigate" (but not eliminate) it. There is no sense of 'community' in this scheme. Care should be taken in such

schemes to ensure such large settlements are treated like new towns and not tacked on to existing historic towns.

#### Queensferry & District Community Council (0568)

In 2015 a Placemaking exercise was carried out by CEC with the full support of QDCC. A final report was approved by the council on Thursday 19th May 2016.

The headline from this report is;

- The strategic objectives will be the subject of a consultation exercise with the community.
- Once these have been agreed they will be passed on to the new Locality Team and/or the relevant service area for taking forward. It may be that an action plan is developed around some of the topics. In the first instance, the draft objectives will be shared with the Queensferry Infrastructure Group to ensure that there is widespread awareness and support for the objectives.

The work hasn't been progressed and remains outstanding. This a serious omission from the City Plan and should be included as it will identify the necessary infrastructure that is needed across the town to cope with the additional population from the housing developments.

Education Infrastructure - a new 14 class primary school at Builyeon Road with additional 2 classrooms and dining hall extension at Echline Primary School and additional High School capacity for 274 pupils.

Queensferry is an expanding town and will attract many young families to locate to Queensferry. The plan makes no mention of nursery provision which will be necessary.

#### Living Streets Edinburgh Group (0486)

There is no reason why pedestrian priority and a largely car free development cannot be an underpinning principle. There is some reference to measures for pedestrians and active travel, but this is to counter the hazardous environment created by a car dominated development. Development should be expected to follow the same principles as proposed elsewhere in the city, designed accordingly, and contributions secured to carry out the necessary enhancements to public transport, pedestrian and cycle infrastructure thereby reflecting the transport hierarchy. It is critical that the plan is consistent in reflecting Scottish Planning Policy and the National Transport Strategy throughout.

#### Pawel Stankiewicz (0445)

A new paragraph should be added: "Area up to 100 m from A/M 90 8 is not used for housing." – to minimise the number of people living in noise and pollution.

#### Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.



## **HSG4: West Newbridge**

### Ratho and District Community Council (0289)

The Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone

### Jansons Property (0733)

Object to the southern part of site 'HSG 4 – West Newbridge' being included as a housing allocation. The site has been carried over from the LDP and has yet to deliver any completions. The northern part of the site could remain as a smaller housing allocation adjacent to the established area of housing in Newbridge but the southern part of the site, located between industrial uses, means it has no reasonable prospect of being delivered for housing. Therefore, it is not effective or deliverable in accordance with paragraph 55 of the Planning Advice Note (PAN) 2/2010: Affordable Housing and Housing Land Audit.

Allocating the southern part of the site for industrial would represent a much more logical use. Proposed City Plan 2030 includes an area of land to the south-west of Newbridge (north of the M8) which has been brought within the urban area as an extension to the settlement's existing Business and Industry Area and the site would work well as an extension to this allocation.

## **HSG 5: Hillwood Road**

### Ratho and District Community Council (0289)

The new World Health Organisation recommendation for maximum noise level over areas where new development is proposed should be implemented.

## **HSG7: Edinburgh Zoo**

### Genna Spears (0081)

Insufficient local infrastructure for additional housing.

### Robin Knops (0494)

The land should not be used for housing but retained in its natural setting as a public amenity for physical and mental well-being. This retention of land will contribute to zero carbon capture and enhance the visitor and residents experience of Edinburgh's natural environment. The land can be used to improve access to and enlarge the open space of Corstorphine Hill.

### Peter Wilkinson (0493)

Object:

- Flood risk, including to lower lying properties on the east side of Kaimes Road.
- Destruction of badger setts. (Protection of Badgers Act 1992).

- Destruction of mature woodland and associated wildlife habitat.
- Increase in vehicular traffic with rise in air pollution. St. John's Road - Corstorphine already has poor air quality levels.

#### **H64: Land at Ferrymuir**

##### Queensferry & District Community Council (0568)

Good office accommodation which houses a NHS 24 call centre will have to be demolished to build 88 flats. The loss of these jobs would have a serious impact on the local economy. Loss would cause local people to travel outside of Queensferry for work. QDCC opposes this proposal as its at odds with the city plan for Net-Zero and LEZ's plans.

##### Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

##### Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### **H65: Old Liston Road**

##### Robyn Mackay (0005)

Object on the basis of:

- Overlooking buildings that will be at the south of the development.
- Increased traffic that will impact the already congested Newbridge roundabout as well as Old Liston Road.
- Lack of access to the proposed development.
- No 2nd access road for emergency services due to the fact that Bridge Street is already developed.

#### **H66: St. Johns Road (A)**

##### Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Duncan Graham (0651)

Proposal should be removed or scaled down:

The amount of housing proposed is excessive for the area and would damage the local environment. The planned areas are just outside the protected heritage area but should be seriously reconsidered. Too much traffic in the area made worse by additional housing - motorists will seek alternatives along quieter residential streets.

Concerns proposed density and the size of the buildings - will really change the light available to large parts of the area and change the skyline. Services (schools and healthcare) are already stretched in the area.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Genna Spears (0081)

Insufficient local infrastructure to support additional housing.

**H67: St Johns Road (B)**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Duncan Graham (0651)

Proposal should be removed or scaled down. Concerns proposed density and the size of the buildings - will really change the light available to large parts of the area and change the skyline. Services (schools and healthcare) are already stretched in the area.

Genna Spears (0081)

Insufficient local infrastructure to support additional housing.

Sheena Moffat (0366)

Concerns with the height and density of any proposed development. This will impinge on the properties situated at 41-59 Forrester Road. These properties would be faced with a loss of amenity relating to existing views towards the Pentland Hills.

There is an existing tree belt within the site which offers protection to the above properties from the traffic noise and pollution from St John's Road.

Will result in the loss of the existing six local businesses currently trading within the boundaries of the proposal.

Lynn Dorio (0622)

Family homes no higher than existing structures with gardens and off-street parking would be more appropriate in this area. Existing trees should remain.

Proposal will lead to loss of view of the Pentlands and potentially impact on privacy and light to neighbouring properties.

Anna Goodwin (0302)

Site includes useful services and a mix of use. Important for an area that is, elsewhere, dominated by hairdressers, food and drink outlets, beauty salons and charity shops.

Support Appendix D in that active frontages would be maintained on not only St. John's Road, but on St. Ninian's Road and St. Ninian's Drive.

Concerned that the addition of residential properties above the "retail or commercial space" proposed for the ground floor could preclude the ongoing use by certain types of businesses, such as repair shops or light industry, that currently provide the important mix of use.

Concerned about the height of any future development - views of the south of Edinburgh and the Pentland Hills may be lost. Should be limits imposed at this stage, so it is clear to potential developers from the outset.

#### **H68: Kirk Loan**

Genna Spears (0081)

Insufficient local infrastructure to support additional housing.

#### **H69: Corstorphine Road A.**

Gayle Green (0408), Fiona Robertson (0133), George Paver (0150), Mariel Roy (0417), ross Urquhart (0029), Mrs Sheena Craigen (0548), Peter Niccol (0296), Nigel Green (0050)

Proposal will lead to neighbouring properties being overshadowed, with a loss of light and privacy.

Gayle Green (0408), Fiona Robertson (0133), George Paver (0150), Mariel Roy (0417), Ben McCready (0515), ross Urquhart (0029), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Myself and my husband, Graham Wilson (0279), Dave Campbell (0492), Peter Niccol (0296), Sarah Adamson (0523), Nigel Green (0050)

Proposal will lead to the loss of well used/required footpath/right of way.

Fiona Robertson (0133), George Paver (0150), Ben McCready (0515), ross Urquhart (0029), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Dave Campbell (0492), Peter Niccol (0296)

Already lack of parking in the area. This would be made worse by new flats.

Gayle Green (0408), Allan Old (0394), Fiona Robertson (0133), George Paver (0150), Myself and my husband, Graham Wilson (0279), Nigel Green (0050)

Plans to build on this site have been rejected in the past and nothing has changed to warrant a change in this decision. Reasons for rejection include building line, listed building, right of way and need for access to a long cul-de-sac, privacy and light.

Fiona Robertson (0133), George Paver (0150)

There have already been issues where emergency vehicles would have been unable to access the end of the Grove (cul-de-sac).

Mariel Roy (0417), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Sarah Adamson (0523)

Proposal would increase traffic and congestion in the area.

Genna Spears (0081)

Insufficient local infrastructure to support additional housing.

Ross Urquhart (0029)

Proposals to densely populate small sites of this scale is not in keeping with the current architecture or residential footprint of Corstorphine village or the current building make up along Corstorphine road generally.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Duncan Graham (0651)

Proposal should be removed or scaled down. Concerns proposed density and the size of the buildings - will really change the light available to large parts of the area and change the skyline. Services (schools and healthcare) are already stretched in the area.

Sarah Adamson (0523)

The building is currently a car hire branch which is well placed close to a large hotel. The area is a wildlife corridor.

### **H70 Corstorphine Road B**

Mrs Sheena Craigen (0548)

- Adverse effect in terms of reduced light and privacy for numbers 42-52 Downie Grove due to being overlooked
- Loss of Right of Way lane to west of present Enterprise company premises;
- Adverse effect on Downie Grove of inevitable rise in traffic and parking.

Ross Urquhart (0029)

Proposals to densely populate small sites of this scale is not in keeping with the current architecture or residential footprint of Corstorphine village or the current building make up along Corstorphine road generally.

Proposal will:

- Add to already strained on transport infrastructure including lack of parking.
- Will further increase congestion
- Will lead to loss of well used footpath/right of way.

Duncan Graham (0651)

Proposal should be removed or scaled down. Concerns proposed density and the size of the buildings - will really change the light available to large parts of the area and change the skyline. Services (schools and healthcare) are already stretched in the area.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Genna Spears (0081)

Insufficient local infrastructure to support additional housing.

Susan Stewart (0567)

Several concerns regarding development:

- Noise relating to demolition
- Noise relating to construction
- Excess waste and rubbish and where this would be stored
- Hours of construction, notably but not limited to home working / older residents / vulnerable residents who are housebound
- Dust/waste landing on residents' cars
- Dust/waste marking residents' windows/entering the property
- Light blocking and impact on daylight
- Questions over area capacity for more parking
- Impact of the noise of any additional residents from new residential or commercial units

**Modifications sought by those submitting representations:**

**Place 16: West Edinburgh**

SAICA (0590)

Criterion (b) of the West Edinburgh Development Principles should be amended as follows "A mix of uses focused around the tram stops, with a particular focus within the land known as Edinburgh 205 (H63) as a town centre development with civic space, community facilities and commercial and leisure uses as the focal point of a new 20-minute neighbourhood. Being in immediate proximity to the Edinburgh Gateway transport interchange, and at the eastern edge of the Edinburgh's westwards settlement extension, the SAICA site should contribute a high-density development approach, acting as a landmark and visual focus.

No further modification specified but it is indicated that further clarification is required on how the Council will co-ordinate a collaborative, multidisciplinary masterplan approach to development across these sites. Additional provision is proposed with regard to phasing to ensure that sites such as H59 can be delivered early in the plan period and are not unduly delayed on account of wider Place 16 complexities.

It is also indicated that the identification of any primary school site requirement – indicative/potential or otherwise within H59 should be removed as well as the identification of a need for 5 primary schools to serve the West Edinburgh allocations (Place 16).

SEPA (0012)

Section 3.61j needs to be clarified. "Designed as proposals allow to reroute the Gogar Burn".

A flood risk assessment is required and a strategic approach to surface water management.

Rosebery Estate (Bankhead) (0618)

Evidence is required to support the need for healthcare contributions

Ratho and District Community Council (0289)

No modification specified but it is indicated that Infrastructure must be in place prior to the commencement of development and in particular improvements to the A8 and the Gogar Roundabout to meet the additional vehicular traffic. The Blue Green network must take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.

Robert Falcon (0640)

No development permissions should be given to sites H61, H62 and H63. Delivering Edinburgh's key economic development needs should not include the West Edinburgh development - It is not acceptable to build on greenfield sites when adequate brownfield sites exist - in particular nearby at Maybury, Gyle and Redford Barracks, in addition to many other brownfield sites throughout the city.

West Craigs Limited (0472)

There should be a specific placed based policy for Craigiehall within Proposed City Plan 2030.

Living Streets Edinburgh Group (0486)

No modifications specified but it is indicated that there should be a clear reference to the transport hierarchy in the policy.

Mark Ockendon (0419)

Modify criterion (l) of the West Edinburgh Development Principles as follows: append "and a clear view of the sky in keeping with Edinburgh's low-level building character".

Modify criterion (n) of the West Edinburgh Development Principles as follows: "to minimise need for private car use and private vehicle ownership" - replace with "to integrate private car use with public transport facilities. Ensure support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Ryden LLP (0578)

No modifications specified but it is indicated that individual applications should not be delayed where they take account of wider adjacencies. Further clarification is required on how the Council will co-ordinate a collaborative, multidisciplinary masterplan approach to development across these sites.



Contributions are required to deliver education provision to support the level of development outlined within West Edinburgh and a more detailed assessment on potential siting option is also required dependent upon timescales and phasing of delivery of individual sites.

Creos Property Limited (0253)

No modifications specified but it is indicated that it is not currently clear how multiple Place Based Policies will apply to sites, and what Policy should take priority, therefore an explanatory note, or clarification on this point within the Proposed Plan, would be welcomed.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

In relation to West Edinburgh (Map 25), we note the divergence away from the expectations of NPF3 which designates the strategic airport enhancement as a national development. Due to the proposed shift in position, as signalled in draft NPF4, regarding this national development, we offer no proposed change in relation to this.

Shelborn Edinburgh Limited (0732)

No modifications specified but it is indicated that the Council should clarify within the Proposed Plan how development proposals in Edinburgh Park/ South Gyle will also be required to adhere to the West Edinburgh Place Policy, if the area is already covered by the site specific Place Policy 19 and associated Development Principles.

Friends of Cammo (0387)

No modifications specified but it is indicated that that the only access crossing the railway line should be for public transport and active travel (bikes and pedestrians). Recommend the development of more direct active travel routes to Cammo LNR than shown in the current plans, and other improvements to connections for active travel.

NatureScot (0528)

Development Principle c) should be amended to include recent work on the green blue network and nature network: "Development which takes account of the West Edinburgh Landscape Framework, work on the city-wide green blue network and nature network as appropriate and considers how the site connects into and delivers the wider, strategic green network at West Edinburgh in creating a landscape structure and green network as a setting for development.."

No further modifications specified but it is indicated that increased capacity of the path network in this area will be required to accommodate significant numbers of people. Site is exposed, particularly in higher areas along and to the south of the tram line. Landform, planting and building form will be key factors in addressing exposure and making this a liveable place that is pleasant to spend time in and move through. Consideration should also be given to building height along the higher parts of the site – potential max height of 8 storeys may be dominant in views from existing areas and routes.

Cockburn Association (0777)

No modifications specified but it is indicated that clarification of the mitigation measures required which will address the negative environmental impacts identified in the Strategic Environmental Assessment Environmental Report.

Pawel Stankiewicz (0445)

A new paragraph should be added to the West Edinburgh Development Principles to say "Area up to 100 m from A8 is not used for housing" so as to not increase the number of people living in noise and pollution".

Hallam Land Management (0615), Tarmac (0244)

No modifications specified but it is indicated that this section on West Edinburgh needs a complete review and clear justification before any decisions on a finalised plan is made. Supporting studies and resultant reports are required to justify the Council's recent change in approach to West Edinburgh proposals. The key on map 27 needs rewording to align with policy/ proposals.

Crosswind Developments Ltd (0184)

Reword Place policy 16 to "Planning permission will be granted for development which will contribute towards the creation of new urban quarters in West Edinburgh (specifically H59, H60, H61, H62 and H63 on the Proposals Map), provided it accords with the West Edinburgh Development Principles. The Council will coordinate a collaborative, multidisciplinary approach to development across these sites via the pre application process. The Movement and Access Plan (Proposed Amendments to plan 24) provided in our submission will ensure that connections and access is enabled between different land ownerships and individual masterplans will be expected to ensure that the primary connections can be made."

Amend criterion (a) of the West Edinburgh Development Principles as follows: "Proposals should assist in creating a high density, sustainable, mixed use, urban extension to the city, compact in form with a sense of place and community attractive to residents, workers and visitors. As a result, West Edinburgh will embody many of the principles that help the City progress toward net zero."

Amend criterion (B) of the West Edinburgh Development Principles as follows: "A mix of uses focused around the tram stops, with a particular focus within the land known as Edinburgh 205 (H63) as a town centre development with civic space, community facilities and commercial and leisure uses as the focal point of a new 20-minute neighbourhood. This area will be further supported by the local centre within H61".

Proposal BGN49 should be marked as 'indicative' on the map. Development principle j should be removed.

Amend criterion (L) of the West Edinburgh Development Principles as follows: "To address and connect across land ownerships and to the wider City – physically, visually and socially, including with urban frontages to site edges where appropriate and with active travel and public transport infrastructure which enables movement around the area and to

the city. Active travel and public transport connectivity between the sites and to the north will be enabled by each development site as far as is reasonable and feasibly possible. Public transport options for orbital bus routes to north and south will be delivered either through improvements to public transport priority at the Gogar and Maybury roundabouts or through public transport access to the north. The Council will co-ordinate a joined-up approach in line with the Movement and Access Plan (Proposed Amendments to plan 24) submitted.

Amend criterion (m) of the West Edinburgh Development Principles as follows: "Road access which follows the principles of the WETA programme in providing a new Gogar Link Road, Airport Link Road and IBG Main Street and access from Eastfield Road will be supported. Planning applications should address the potential for local access from the south of the area to the A8 in conjunction with transport and traffic improvements on the A8."

Amend criterion (n) of the West Edinburgh Development Principles as follows: "Internal connectivity for active travel and public transport modes, including relationship with the Ingliston Park & Ride site and how that site might be relocated or redesigned for the better overall place making of the area. Planning applications should develop a design, parking strategy and parking standards approach to minimise need for private car use and private vehicle ownership. This and other demand management measures are an important element of relevant local, regional and national policies and will be critical in promoting sustainable travel behaviour in West Edinburgh area".

Amend criterion (O) of the West Edinburgh Development Principles as follows: "Planning applications should establish how a mix of uses, including vertical mix, is distributed across the area. The mix will include but not be limited to retail, professional services, food and drink, office and light industrial, industrial in appropriate locations away from residential use, assembly and leisure and community facilities/hubs as well as high and medium density residential with mixed tenure development as required by other plan policies".

Amend the wording of aim 1 of the City Plan 2030 Aims to include wheeling and cycling, as well as walking.

No further modifications specified but it is indicated that representee questions the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG. Map 24 should reflect or recognise 2 recent planning applications (20/03219/PPP and 21/00217/FUL). The map should be marked as indicative (others in the proposed plan are).

In relation to the masterplan requirement, the policy provides no information on when, how and who will be involved in facilitating the creation of a masterplan, nor what the masterplan itself should comprise. The Council can co-ordinate development to ensure the sites work together without the need for a full detailed master plan to which all parties must accord. There is excessive school provision identified based upon Communities and Families calculation for CDLs current application.

The identification of a town / local centre within the proposal site H61 should be outlined on the Proposals Map. Table 14 should also show this as a new town/local centre for site H61.

There should be a distinction between the town centre and local centre on Map 24. The location of the new local centre noted in Map 11 and map 24 should be clarified. H63 should have a town centre and site H61 a local centre.

The location of proposed primary school/education infrastructure marked on Map 24 and the proposals map should be clarified.

The shading of the area which identifies housing in Map 25 and the proposals map should be standardised.

CDL would like this site to be allocated for mixed use.

CDL are supportive of aim 5 (Climate change and mitigation) of the City Plan 2030 Aims highlighted on p8, in general, however this is qualified by detailed responses in other sections.

It is indicated that aim 6 of the City Plan 2030 Aims (Minimum 35% affordable housing contribution) should be amended, and that an increase on 25 % would require justification and should be sought on a case by case basis, rather than as a blanket policy requirement.

CDL object to level of new school infrastructure identified as being delivered on their land, allocated site H61. The number of new schools proposed to be located within the West Edinburgh area seems excessive given the likely mix of flats to be developed out. Communities and Families have previously agreed that site H61 will generate a total of 137 primary aged children and 62 Secondary aged children. These figures are significantly different from those contained in the Education Assessment which suggests that site H16 will generate 456 Non Denominational primary aged children. This is clearly not correct.

CDL object to the Strategic Business Centre area highlighted on the Proposals Map for West Edinburgh as it does not include the CDL site and therefore does not support economic development including offices on that site. The CDL site is within the wider area that is identified as an Area of Economic Importance but there are no policies attributable to that designation and while Table 13 states that supporting uses will still include significant opportunities for business the policy position does not support this for the Crosswind site (H61).

#### Edinburgh Airport Limited (0761)

Development principle j). should be deleted.

Reword Place policy 16 to "Planning permission will be granted for development which will contribute towards the creation of new urban quarters in West Edinburgh (specifically H59, H60, H61, H62 and H63 on the Proposals Map), provided it accords with the West Edinburgh Development Principles. The Council will coordinate a collaborative, multidisciplinary approach to development across these sites via the pre application process. The Movement and Access Plan (Proposed Amendments to plan 24) provided in our submission will ensure that connections and access is enabled between different land ownerships and individual masterplans will be expected to ensure that the primary connections can be made."

Amend criterion (L) of the West Edinburgh Development Principles as follows:

“To address and connect across land ownerships and to the wider City – physically, visually and socially, including with urban frontages to site edges where appropriate and with active travel and public transport infrastructure which enables movement around the area and to the city. Active travel and public transport connectivity between the sites and to the north will be enabled by each development site as far as is reasonable and feasibly possible. Public transport options for orbital bus routes to north and south will be delivered either through improvements to public transport priority at the Gogar and Maybury roundabouts or through public transport access to the north. The Council will co-ordinate a joined-up approach in line with the Movement and Access Plan.”

Amend criterion (M) of the West Edinburgh Development Principles as follows: “Road access which follows the principles of the WETA programme in providing a new Gogar Link Road, Airport Link Road and IBG Main Street and access from Eastfield Road will be supported. Planning applications should address the potential for local access from the south of the area to the A8 in conjunction with transport and traffic improvements on the A8.”

Amend criterion (N) of the West Edinburgh Development Principles as follows:

“Internal connectivity for active travel and public transport modes, including relationship with the Ingliston Park & Ride site and how that site might be relocated or redesigned for the better overall place making of the area. Planning applications should develop a design, parking strategy and parking standards approach to minimise need for private car use and private vehicle ownership. This and other demand management measures are an important element of relevant local, regional and national policies and will be critical in promoting sustainable travel behaviour in West Edinburgh area”.

Amend criterion (O) of the West Edinburgh Development Principles as follows:

“Planning applications should establish how a mix of uses, including vertical mix, is distributed across the area. The mix will include but not be limited to retail, professional services, food and drink, office and light industrial, industrial in appropriate locations away from residential use, assembly and leisure and community facilities/hubs as well as high and medium density residential with mixed tenure development as required by other plan policies”.

The errata and Map, Map 24, Map 1, Map 8 should be updated and aligned.

The new primary vehicle route on Map 24 should be located on the eastern side, adjacent to the railway lines, to avoid running a Primary Road through the middle of the development site and a new local centre given the ambitions that this should be a car lite development. An Airport Link Road as set out in the WETA Refresh 2016 (WETA 18) and in line with WE29 requires to be shown connecting to the Eastern Terminus. This should be shown as an extension to the new primary route that we have requested is shown adjacent to the Railway line and that it should connect to the Airport Eastern Terminus via Eastfield Avenue.

Remove the re-routing of the Gogar Burn / river restoration proposal.

Remove the indicative location for a primary school identified within the airport's boundary.

The Association for the Protection of Rural Scotland (0334)

No modification specified but it is indicated that the topographical interest of Corstorphine Hill and the extensive woodland south of the A8 in the vicinity of the RBS HQ should also be reflected in the landscape design.

Archie Clark (0003)

No modification specified but it is indicated that the wide variety in size of local centres is not reflected in how they are described. Some have banks and/or Post Offices, others have no such facilities and is the objective not to make them within 10 minutes' walk of home?

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

No modification specified but it is indicated that unused accommodation should be used before development is considered in West Edinburgh to prevent unnecessary urban sprawl. Green Belt development should be completely avoided as this will create problems on a wide variety of fronts – including loss of farmland, pollution, services provisions, drainage, etc. The area will become over populated as people move out of town from the to living in a 'green field' development.

Sites are large and will require adequate facilities - a detailed fully-co-ordinated masterplan needs to be prepared by CEC to indicate the extent of shopping/ commercial/ administrative/ education/ workplace/ recreation facilities including full-sized football/rugby pitches in H63. Areas H59-H62 need to be incorporated so that residents are not encouraged to resort to their own transport. In total – a very large development that should be considered as a NEW TOWN - complete with sufficient workplaces for the entire community.

Table 13 - Areas of Economic Importance: the proposals for West Edinburgh must be reviewed immediately after the 2022 Census, as this will inform and no doubt change the assessment of what additional housing will be required.

Page 75, bullet I, refers to, "An iterative process with the use of TVIA..." with no explanation of what TVIA is ("Townscape and Visual Impact Assessment"?). Unclear descriptions like this require definition.

Developments proposed in areas H59-H63, coupled with the impact of LEZs and prohibitions on entering and parking in the centre of the city, will see the city centre hollowed out, with new greenfield development using up prime quality farmland. That goes against the issues raised at COP26 regarding climate change and is to be resisted.

Corstorphine Community Council (0799)

No modification specified but it is indicated that development principle q should be explained in detail. Would like to see inclusion of accessibility standards within development principles so that West Edinburgh is genuinely inclusive and accessible to all.

As this development is sandwiched between two existing AQMAs (St Johns Road and Glasgow Road) design principles should include improvements of air quality so that any development and planning actively works to reduce air pollution impacts.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

Simon Thompson (0248)

No modification specified but it is indicated that a proportion of the sites in West Edinburgh may come forward in the next 10 years but this is not backed up by any detailed assessment or justification. Indeed a large part of the West Edinburgh proposal is identified as an Area of Economic Importance as was considered of national economic importance by the Scottish Government.

Edinburgh World Heritage (0339)

Bullet point 4 of the 'Requirements in Principle' (page 72) needs to be rephased to state "...agreed with the Council, that conserves or enhances key views, surrounding landscape...."

**H59: Land at Turnhouse Road (SAICA)**

SAICA (0590)

No modification specified but it is indicated that the identification of any primary school site requirement – indicative/potential or otherwise – within our client's landholding (H59) - a dedicated school for the H60 Turnhouse Road / H59 SAICA allocations should be removed as well as the identification of a need for 5 primary schools to serve the West Edinburgh allocations (Place 16).

Ryden LLP (0578)

No modification specified but it is indicated that density, scale, height and massing should be encouraged at key transport nodes and interchanges to provide the most sustainable use of land at these key locations.

The proposed siting of a new Primary School should be reviewed further and a full comparative analysis undertaken based on education requirements as well as design principles for placemaking and most efficient patterns of use of land.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure for additional housing

**H60: Turnhouse Road**

Cramond & Barnton Community Council (0243)

H60 Turnhouse Road should be removed from the plan until -

a. A full assessment has been undertaken of the potential economic and operational impacts on existing commercial, industrial and service businesses currently operating at this site.

b. Measures are identified for mitigating any detrimental impacts from displacing or otherwise affecting these businesses through implementation of proposed housing on this site.

Mrs Patricia Stott (0349)

No modification specified but it is indicated that redevelopment for housing is likely to have an impact on these existing businesses, the employment they provide and their contribution to the City's economy. Displacement of such businesses would be contrary to the 20 minute neighbourhood principles.

Inverdunning (Hatton Mains) Ltd (0427)

Remove H60 from the plan.

Simon Thomson (0248)

Remove H60 from the plan.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure for new housing.

### **H61: Crosswinds**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Delete proposal H61 Crosswinds

West Craigs Limited (0472)

No modification specified but it is indicated that the representee supports the separate school provision at H61

Ratho and District Community Council (0289)

No modification specified but it is indicated that the new World Health Organisation recommendation for maximum noise level over areas where new development is proposed should be implemented.

The Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.



Simon Thomson (0248)

No modification specified but it is indicated that the site capacity should be amended significantly downwards and justification should be provided for delivery: This scale of development is not achievable in the plan period given the extensive infrastructure requirements set out in the plan for new town centre, schools and roads.

Inverdunning (Hatton Mains) Ltd (0427)

No modification specified but it is indicated that the unit numbers should be amended – not wholly deliverable within plan period. There is currently a live planning appeal.

Edinburgh Airport Noise Advisory Board (0691)

No modification specified but it is indicated that residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport which presently includes the majority of the proposed developmental areas between Edinburgh Airport and the A8 corridor. City Plan should have a noise policy (with a noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure to support levels of additional housing.

Crosswinds Developments Ltd (0184)

No modification specified but it is indicated that policy (Env 35) requirements when set alongside requirements for 20% open space, 35% affordable housing, housing densities of 65 units per Ha, etc would, when taken as a whole, potentially preclude the efficient development of this brownfield site.

**H62: Land adjacent to Edinburgh Gateway**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

H62 should be removed from the plan.

West Craigs Limited (0472)

The requirement for a Council-led masterplan should be removed from the text of Place 16 and replaced by a requirement for all development to demonstrate it would not jeopardise the development of any adjacent site.

No further modification specified but it is indicated that allocating the site for higher density development would be compliant with the overall principles of City Plan 2030, which seeks to locate high density development in highly accessible locations. Given proximity to the Tram operations, it may be that residential development on this part of the site would be

unfeasible on noise impact grounds. Some flexibility should be included within allocation H62 to be supportive of other uses.

Do not agree that it is appropriate to include H62 within the school provision area. It would be appropriate to link any developer contributions for new school infrastructure arising from the development of H62 to Maybury Primary and Craigmount High.

Edinburgh Airport Noise Advisory Board (0691)

No modification specified but it is indicated that residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport which presently includes the majority of the proposed developmental areas between Edinburgh Airport and the A8 corridor. City Plan should have a noise policy (with a noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

Crosswind Developments Ltd (0184)

No modification specified but it is indicated that the representee questions the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG.

**H63: Edinburgh 205**

Murray Estates (0197), SEEDCo (0198), Persimmon Homes (0495), Taylor Wimpey (0200), BDW Trading (0350), Robertson Residential Group Limited (0490)

No modification specified but it is indicated that H63 should be removed from the plan.

Murray Estates (0197), SEEDCo (0198), Persimmon Homes (0495), Taylor Wimpey (0200), BDW Trading (0350), Robertson Residential Group Limited (0490), Stewart Milne Homes (0118)

No modification specified but it is indicated that re-allocating approximately 400 active businesses and strategic employment sites (including land at Edinburgh 205) for housing will not deliver the outcome 'A city where everyone shares in its economic success'.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Delete proposal H63: Edinburgh 205

West Craigs Limited (0472)

No modification specified but it is indicated that the representee supports separate school provision at H63.

Ratho and District Community Council (0289)

No modification specified but it is indicated that the new World Health Organisation recommendation for maximum noise level over areas where new development is proposed should be implemented.

The Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.

Stirling Developments Limited (0303)

No modification specified but it is indicated that H63 proposes 7000 units on what appears to be a greenfield site that was not identified through the Choices document.

The plan needs to offer flexibility to support effective greenfield sites should the supported brownfield sites fail to deliver. Sites like Calderwood, which was identified in Choices is further supported by the City Deal and NPF4. Effective sites like Calderwood should be supported within City Plan as Calderwood has the ability to deliver homes of all tenures in a 20 minute neighbourhood.

Inverdunning (Hatton Mains) Ltd (0427)

No modification specified but it is indicated that the unit numbers should be amended – not wholly deliverable within plan period. There is currently a live planning appeal. Questions are raised regarding the density and unit calculations for the site.

Simon Thomson (0248)

No modification specified but it is indicated that the site capacity should be amended significantly downwards and justification should be provided for delivery: This scale of development is not achievable in the plan period given the extensive infrastructure requirements set out in the plan for new town centre, schools and roads.

Edinburgh Airport Noise Advisory Board (0691)

No modification specified but it is indicated that residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport which presently includes the majority of the proposed developmental areas between Edinburgh Airport and the A8 corridor. City Plan should have a noise policy (with a noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

SEEDCo (0198)

H63 should be removed from the plan.

Corstorphine Community Council (0799)

No modification specified but it is indicated that all strategic development sites to include impact assessments for noise.

West Town Edinburgh Ltd (0660)

Support noted.

## **Place 17: Edinburgh Airport**

### Edinburgh Airport Limited (0761)

The requirement of a masterplan should be removed as a requirement from Place Policy 17. An airport boundary should be shown on the proposed Proposals Map

The reference to the West Edinburgh Strategic Design Framework should be removed from para 3.62. The following wording is requested:

"The development and enhancement of Edinburgh Airport will be supported within the airport boundary defined on the Proposals Map this includes proposals for new active travel linkages and new connections to existing infrastructure to provide greater access and improve resilience. Proposals for ancillary services and facilities will only be permitted where it can be demonstrated that these have strong and direct functional and locational links with the airport and are compatible with the operational requirements of the airport. All development proposals within the airport boundary must accord with the West Edinburgh Development Principles, where applicable, and other relevant local development plan policies. Supporting information will be required to demonstrate how proposals will contribute to meeting the infrastructure requirements identified for West Edinburgh. Land to the north of the existing airport boundary is safeguarded to provide a second main parallel runway, if required in the future, to meet air passenger growth forecasts. Within this area, green belt policy will apply (policy Env 18) until such time as this land is required by the Airport. Proposals which would prejudice the long-term expansion of Edinburgh Airport will not be supported."

The following wording for para 3.62 is also requested:

"3.62 The purpose of this policy is to guide proposals at Edinburgh Airport. The policy covers proposals for airport and related uses that require planning permission (some airport proposals are 'permitted development' i.e., planning permission is not needed). Compliance with the other relevant plan policies will ensure airport proposals within the Airport's operational area that do not benefit from permitted development rights are acceptable in terms of scale and location, accessibility by public transport, pedestrians and cyclists, traffic generation and car parking and other environmental considerations."

The wording of Env 31 should be amended to: "Where appropriate, proposals containing new build development (except householder development and housing proposals covered by policy Env 32 below) shall include the provision of good quality, attractive, useable and where appropriate publicly accessible open space that forms at least 20% of the total site area."

### Lord Dalmeny (0475)

The land, in the ownership of Lord Dalmeny to the north of Lennymuir at Turnhouse, should be removed from the Countryside designation and be incorporated into the specific policy provision that identifies Edinburgh Airport as an 'Area of Economic Importance'

### Mr Roger Thomas (0345)

Remove sentences:

"Land to the north of the existing airport boundary is safeguarded to provide a second main parallel runway, if required in the future, to meet air passenger growth forecasts."  
"Proposals which would prejudice the long-term expansion of Edinburgh Airport will not be supported."

Frances Guy (0589)

Remove all commitments to airport expansion

Robert Falcon (0640)

Safeguarding land for future airport expansion should be removed from the plan and rejected as a policy principle.

SEPA (0012)

Would like more detail on this 'Place'. While Place 17 (Edinburgh Airport) is separate from Place 16 (Crosswinds) EMP4 combines them in one site. It should be clarified if they are separate sites or a combined site.

A detailed FRA which informs site design is required in order to ensure that there is no associated increase in flood risk out with the site and to ensure that there is no unacceptable flood risk for future uses of the site.

Cockburn Association (0777)

No modifications specified but it is indicated that clarification of the mitigation measures required which will address the negative environmental impacts identified in the Strategic Environmental Assessment Environmental Report.

L Gunstensen (0663)

The Proposed Plan should be modified:

1. So that reference to the second runway is removed from the Plan and Proposals Map, or
2. If it is to remain in the Plan but without giving express support to any potential application, it should be clarified that a 'safeguard' is different from a proposal and that any application would not be supported by the Plan, or
3. if the runway is to remain in the Plan and the Plan would provide any level of support to any application for a second runway then the SEA must be updated to consider the full range of significant environmental effects appropriate at the plan stage.

Esme Clelland (0778)

The safeguarding of the second runway should be removed from the plan.

Jamie Wallace (0167)

"Land to the north of the existing airport boundary is safeguarded to provide a second main parallel runway, if required in the future, to meet air passenger growth forecasts."

Should be changed to:

"Land to the north of the existing airport boundary will be safeguarded to provide a second main parallel runway, if required in the future to meet air passenger growth forecasts, and if it can be demonstrated that such growth will not jeopardise city, regional, or national net zero carbon reduction targets, in particular compliance with any carbon budgets for the aviation sector developed by the Scottish Government."

#### Hallam Land Management (0615)

No modifications specified but it is indicated that the Council should consult on and approve airport masterplan before including specific policy direction:

An agreed masterplan must inform this Place policy - Masterplan has not been proposed as part of the LDP or consulted upon during Choices. Place 17 is unprecise and unspecific in terms of future operations and ancillary land uses in relation to safeguarding land.

The notional safeguarded area for second runway should be removed.

Strategic Environmental Assessment conducted on site options are unclear regarding noise issues. Hallam reserves the right to rebuttal through specialist advice if necessary, as part of the Examination.

#### Edinburgh Airport Noise Advisory Board (EANAB) (0720)

No modifications specified but it is indicated that it should be made clear whether the second runway at Edinburgh Airport (p.76) is actually supported by the Plan, or merely the land safeguarded. The additional noise impact of the second runway, on both existing and proposed residential areas, should be taken into account in the Environmental Report should the Plan support the development.

#### RSPB (0648)

No modifications specified but it is indicated that the representee does not support plans for a second parallel runway at Edinburgh airport that will enable an increase in flights to and from Edinburgh. This is not consistent with other climate change and sustainability policies within the City Plan 2030.

#### Anna Brand (0742)

No modifications specified but it is indicated that prioritising the development of an airport is at odds with a climate emergency.

#### Spokes Lothian (0545)

No modifications specified but it is indicated that spokes does not support expansion of airport capacity. In addition to that major and over-riding objection, the proposed second runway site would compromise the Newbridge / Kirkliston / Dalmeny cycle route whilst also increasing carbon emissions and unsustainable transport.

#### Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

#### **Place 18: Gogarburn**

##### SEPA (0012)

A detailed FRA which informs site design is required in order to ensure that there is no associated increase in flood risk out with the site and to ensure that there is no unacceptable flood risk for future uses of the site. No further modification specified but it is indicated that this site could incorporate the Gogar Burn diversion scheme, which could have implications for the layout and design of the development. Should development go ahead without a wider understanding of the catchment, there is a risk that the Gogar Burn realignment, which would deliver multiple benefits, may be jeopardised. Should the Gogar Burn not be realigned, this may affect the developable area as well.

##### Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

##### NatWest (0477)

Support Noted.

#### **Place 19: Edinburgh Park/South Gyle.**

##### Mark Ockendon (0419)

New requirement: "Ensure support for low-carbon vehicles by providing electric vehicle charging points for new private housing, and on-street parking."

##### Hallam Land Management (0615), Tarmac (0244)

Alter page 27 map key which identifies this site as a 'Housing Led Development'. It is not a housing led development and this has not been previously suggested or assessed.

No further specific modification but it is indicated that justification is required for the increase of proposed housing units across site to the detriment of office and employment land.

##### Redline Planning Services Ltd (0673)

Amend Place based requirement c) on page 77 to read: "Housing as a component of business-led mixed-use proposals, unless it can be demonstrated that a housing-led mixed-use proposal is more appropriate."

Amend part c) of the development principles for the areas EP3-5 on page 79 of the Proposed LDP to say: "In EP4, commercial and mixed-use proposals (including residential-led proposals) will be supported. Where practicable, development should provide increased permeability, create a direct relationship with South Gyle Broadway and improve the pedestrian and cycling environment along South Gyle Crescent".

Request that the Tesco landholding at South Gyle is identified as a specific "housing-led mixed redevelopment" opportunity within parcel EP4 on map 26, page 78. and that this residential development opportunity on is reflected in Table 2 of Part 4 of the Proposed LDP, with an indicative capacity for c. 300 dwellings to be developed in accordance with the principles of Place 19. EP4 should also be separately identified in the associated key, distinct from EP3.

#### BDW Trading (0350)

Amend part c of Place 19 to: "housing as a component of business-led mixed-use proposals, unless it can be demonstrated that a housing-led mixed use proposal is more appropriate."

Amend Map 26 on page 78, to distinguish between EP3 and EP4, and add the following reference for EP4. "business or housing-led redevelopment"

#### Pawel Stankiewicz (0445)

New paragraphs should be added :

- 1) "Area up to 100 m from Edinburgh bypass is not used for housing." To avoid people living in polluted areas.
- 2) "Tram stops and railway stations are focus points of footpaths coming to them diagonally across urban blocks in case of their (re)development." - In the case of square urban blocks, diagonal routes cut walking distance up to 30 %.

#### SEPA (0012)

No modifications specified but it is indicated that the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Nearby areas susceptible to both fluvial and surface water flooding. Surface water flooding reported regularly along South Gyle Broadway.

#### Living Streets Edinburgh Group (0486)

No modification is specified but it is indicated that the Council should be more radical in capitalising on the excellent public transport infrastructure that exists by enhancing it, removing as much car parking as possible and making pedestrian movement the focus of future place making development of this area.

#### Ambassador Group (0683)

No modification is specified but it is indicated that increased permeability will be dependent on individual sites and applications coming forward.



#### Shelborn Edinburgh Limited (0732)

No modification is specified but it is indicated that the map associated with the Development Principles should be updated to reflect the developments that have been consented, or are proposed, for the area. Place 19 should be developed further to make reference to the fact that the area can support a higher density of development. The Council should support the redevelopment of sites in the area that are reaching the end of their operational life and becoming obsolete.

#### Parabola Edinburgh Limited (0723)

No modification is specified but it is indicated that given the highly accessible nature of the Edinburgh Park / South Gyle area, Place 19 Policy should be further developed to make reference to the fact that this is an area of the city that can support a higher density of development.

#### Archie Clark (0003)

The location of EP2 should be shown on the plan.

No further modification is specified but it is indicated that with regards to criterion (H) the level of demand for this should be shown and will this provision be matched by public transport? There should be an explanation of what a CPZ is and clarity on whether this is intended to provide income to the City.

#### Corstorphine Community Council (0799)

The Edinburgh Park Development Principles should include the proposed orbital bus provision.

No further modification is specified but it is indicated that the policy should include accessibility standards within development principles so that West Edinburgh is genuinely inclusive and accessible to all.

While proposed housing is close to amenities such as Hermiston Gait and Edinburgh Park train station, CCC fails to see how this development meets the requirements for a 20 minute neighbourhood. There are no amenities such as doctors' surgeries, dentists or primary schools that are easily accessible from this area. The design principles for Edinburgh Park/South Gyle don't really mention public transport.

#### Royal Mail Group Limited (0501)

The sites owned by Royal Mail should be re-allocated as Business and Industry Areas under Policy ECON4 of the plan.

If the Council see fit to retain any proposals for residential use on the land adjoining the properties set out in the representation (assuming the allocation pertaining to each site is removed), the relevant policies and the associated information set out in Appendix D of the Local Plan should make reference to Royal Mail's operations and should ensure that any necessary mitigation is provided by the applicant at the application stage to guarantee that there is no undue impact to Royal Mail.

Genna Spears (0081)

No modification is specified but it is indicated that this extra housing without any extra local services being added is going to even more pressure on overloaded services. Insufficient capacity in Schools, GPs, Dentists.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

APAM / Bankfoot APAM (0355)

Support noted.

**Place 20: Royal Highland Centre**

Creos Property Limited (0253)

No modification specified but it is indicated that it is not currently clear how multiple Place Based Policies will apply to sites, and what Policy should take priority, therefore an explanatory note, or clarification on this point within the Proposed Plan, would be welcomed. Creos would encourage the Council to reconsider the wording of this Policy, to ensure that development is not inhibited by its requirements and would suggest that this could be updated to state that proposals should support the primary activity of the RHC.

Taylor Wimpey and Hallam Land Management Ltd (0603)

The safeguard for the possible relocation of the RHC should be removed from City Plan 2030.

Royal Highland & Agricultural Society of Scotland (0482)

Amend wording to:

"The development and enhancement of the Royal Highland Centre (RHC) will be supported within the boundary defined on the Proposals Map, provided proposals accord with a strategic sitewide masterplan. Ancillary uses will only be permitted where it can be demonstrated that these are linked to the primary activities of the RHC".

Text in table 13 should be edited to include hotels (plural) in terms of uses defined by the masterplan principles and consistent with Policy ECON 6.

SEPA (0012)

No modification specified but it is indicated that SEPA are uncertain that the principles for this Place are being clearly established. While it appears that the purpose of the Place is to protect the existing Royal Highland Centre, it appears, that should it be required, the airport will use it for expansion. This should be clarified or confirmed.

Reference is made to flood management and we agree that this needs to be a major consideration when considering any re-development of this site.

Mr Roger Thomas (0345)

p. 79: Place 20, Royal Highland Centre: "The policy also safeguards the site for the long-term expansion of Edinburgh Airport ...."  
This item should therefore be removed.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

### **Place 21: Riccarton University Campus and Business Park**

Heriot Watt University (0468)

Suggested re-wording:

Place Policy 21: Development for the following purposes will be supported within the boundary of Riccarton University Campus and Business Park, provided proposals accord with the approved, or subsequently approved, masterplan and other relevant local development plan policies.

- Academic teaching and research.
- Uses .....complementary and/or ancillary..... to the University, including student residential accommodation, .....local convenience, food and drink, ..... sport and recreational facilities.
- Business uses, including the manufacture, research and development of products and processes, where a functional linkage with the University's academic activities can be demonstrated.

Specific wording and reference in Table 13 should clarify the chronology of masterplans with additional wording as follows....

A Masterplan was approved in January 2001....and updated in 2010 as a Framework for Development. A new Masterplan is due to be published by the University in 2022 to provide context for the next phase of campus wide investment.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

### **Place 22: Maybury**

Mark Ockendon (0419)

new requirement: "Ensure support for low-carbon vehicles by providing electric vehicle charging points for new private housing, and on-street parking."

#### West Craigs Limited (0472)

No modification specified but it is indicated that with regards to HSG19 / West Craigs, the Programme's expected build out rates in the audit for Maybury Central (1,400 units – reference: 5246.2) is significantly lower than our own forecasts. We would request that the build out rates contained within the Housing Land Audit and Completions Programme 2021 are updated to reflect the existing position on the site.

#### Rosebery Estate (Bankhead) (0618)

Delete the annotation on Maps 2 & 8, and all other references relating to the West Edinburgh Transport Improvements (WE12) in so far as they show a potential connection from the new addition to Place 16 adjacent to H61 linking over the railway into the Maybury (Place 22/HSG19) housing allocation being carried forward from the LDP.

Remove the new land allocation adjacent to H61 identified in Place 16 and its associated potential public transport link (WE1).

The following development principles should be deleted:

- "m) Address the transport infrastructure mitigation requirements at Maybury junction, Barnton junction and Craigs Road Junction and support delivery of the bus priority and interchange recommendations that emerge from the on-going West Edinburgh Transport Improvement Programme study." Transport Contribution Zone (Para 3.59) should only apply to those sites in Place 16/West Edinburgh allocated in this document, not sites being brought forward from the LDP which are in the process of being delivered.
- "(u). Provide or contribute towards healthcare infrastructure and community facilities" - Evidence is required to justify healthcare contributions.

#### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

No modification specified but it is indicated that on page 80, Place 22, The introduction is not grammatical, "Planning permission will be granted for development within the boundary of Maybury as defined on the Proposals Map will be granted provided it accords with the Maybury and Development Principles and the approved, or subsequently approved, master plan."

#### Archie Clark (0003)

The site needs to be linked over the railway line to H61, H62 and H63 so that a more varied shopping experience can be obtained.

No further modification specified but it is indicated that LDP2016 HSG20 has disappeared from the map (Appendix 2b). A check needs to be made to ensure that other areas previously approved are included. The proposed new footpath/cycle path appears to be inadequate, even though it may help to resolve the serious congestion that can be expected at the Gogar roundabout.

Living Streets Edinburgh Group (0486)

No modification specified but it is indicated that it is critical that the plan is consistent in reflecting Scottish Planning Policy and the National Transport Strategy throughout.

RSPB (0648)

No modification specified but it is indicated that RSPB support sections 3.68j 'Provision of new woodland and grassland habitat (30m depth) to create a strong green belt boundary adjoining Craigs Road along the northern edge of the site.'

Corstorphine Community Council (0799)

Item m junction improvements should also include reference to improvements for pedestrians and cyclists.

The Association for the Protection of Rural Scotland (0334)

No modification is specified but it is indicated that a clarification of the sites present/new status is required - is it now classified as Countryside, in which case green belt principles (or key elements) for development should still apply?

The plan indicates landscaped areas in diagrammatic geometric shapes. To avoid misinterpretation, it is important to indicate such areas more accurately with 'naturalistic' shapes. Scattered small areas of trees, shrubs, green/blue open space throughout the area could substantially enhance the environment quality of the development. The proposal to improve the character of Turnhouse Road appears to be minimal and inadequate from the plan. There appears to be a dearth of street trees, small copses and green/blue areas scattered along its length. Will these deficiencies be addressed?

Pawel Stankiewicz (0445)

Criterion (f) of the Maybury Development Principles should be amended to: "Opportunity for higher density development within walking distance to tram halt and railway station within at least 1000 metres from the tram stop."

A paragraph should also be added: "New footpath is provided running from pedestrian/cycle bridge towards NNW." - In the case of square urban blocks, diagonal routes cut walking distance up to 30 %

SEPA (0012)

No modification is specified but it is indicated that the realignment of the Gogar Burn was never proposed to go through this site. If the Gogar is to be re-routed through this site then that would require further work.

Cramond & Barnton Community Council (0243)

Place 22 should be omitted from Proposed City Plan.

Mrs Patricia Stott (0349)

Place 22 should be omitted from Proposed City Plan.

Genna Spears (0081)

No modification is specified but it is indicated that there is insufficient local infrastructure for additional housing.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

**Place 23: Builyeon Road**

Mark Ockendon (0419)

new requirement: "Ensure support for low-carbon vehicles by providing electric vehicle charging points for new private housing, and on-street parking."

Archie Clark (0003)

No modification is specified but it is indicated that a Page 82, Place 23 Builyeon Road – This site (HSG32 and SCH10 in LDP2016), as shown in application 21/04019/AMC would produce a soul-less development of 840 houses, a primary school and limited workplaces. There is very little useable green space. With few onsite workplaces commuter and service traffic will be substantial.

Queensferry & District Community Council (0568)

Add in outcomes from the Queensferry Placemaking consultations report May 2016. The work and aims of a placemaking exercise hasn't been progressed and remains outstanding. This is a serious omission from the City Plan and should be included as it will identify the necessary infrastructure that is needed across the town to cope with the additional population from the housing developments. The plan makes no mention of nursery provision which will be necessary.

Living Streets Edinburgh Group (0486)

No modification is specified but it is indicated that it is critical that the plan is consistent in reflecting Scottish Planning Policy and the National Transport Strategy throughout.

Pawel Stankiewicz (0445)

A new paragraph should be added: "Area up to 100 m from A/M 90 8 is not used for housing." – to minimise the number of people living in noise and pollution.

Anna Goodwin (0302)

The wording of the strategy commonly uses 'should' when referring to assessments that need to take place and for requirements laid out in the development principles. There are times when this needs to be definitive and say 'must'.

#### **HSG4: West Newbridge**

##### Ratho and District Community Council (0289)

No modification is specified but it is indicated that the Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone.

##### Jansons Property (0733)

No modification is specified but it is indicated that the represented objects to the southern part of site 'HSG 4 – West Newbridge' being included as a housing allocation. Allocating the southern part of the site for industrial would represent a much more logical use. Proposed City Plan 2030 includes an area of land to the south-west of Newbridge (north of the M8) which has been brought within the urban area as an extension to the settlement's existing Business and Industry Area and the site would work well as an extension to this allocation.

#### **HSG 5: Hillwood Road**

##### Ratho and District Community Council (0289)

No modification is specified but it is indicated that the new World Health Organisation recommendation for maximum noise level over areas where new development is proposed should be implemented

#### **HSG7: Edinburgh Zoo**

##### Genna Spears (0081)

No modification is specified but it is indicated that there is insufficient local infrastructure for additional housing.

##### Robin Knops (0494)

No modification is specified but it is indicated that the land should not be used for housing but retained in its natural setting as a public amenity for physical and mental well-being.

##### Peter Wilkinson (0493)

No modification is specified but it is indicated that the representee objects to the site being included in the plan due to:

Flood risk, including to lower lying properties on the east side of Kaimes Road. Destruction of badger setts. (Protection of Badgers Act 1992 ). Destruction of mature woodland and associated wildlife habitat and increase in vehicular traffic with rise in air pollution. St. John's Road - Corstorphine already has poor air quality levels.

**H64: Land at Ferrymuir**

Queensferry & District Community Council (0568)

No modification is specified but it is indicated that the QDCC opposes this proposal as its at odds with the city plan for Net-Zero and LEZ's plans.

Simon Thomson (0248)

Remove H64 from the plan.

Inverdunning (Hatton Mains) Ltd (0427)

Remove H64 from the plan.

**H65: Old Liston Road**

Robyn Mackay (0005)

No modification specified but it is indicated that the representee objects to the inclusion of the site within the plan on the basis of: Overlooking buildings that will be at the south of the development. Increased traffic that will impact the already congested Newbridge roundabout as well as Old Liston Road. Lack of access to the proposed development. No 2nd access road for emergency services due to the fact that Bridge Street is already developed.

**H66: St. Johns Road (A)**

Duncan Graham (0651)

No modification specified but it is indicated that the proposal should be removed or scaled down.

Inverdunning (Hatton Mains) Ltd (0427)

Remove H66 from the plan.

Simon Thomson (0248)

Remove H66 from the plan.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure to support additional housing.

**H67: St Johns Road (B)**

Duncan Graham (0651)



No modification specified but it is indicated that the proposal should be removed or scaled down.

Inverdunning (Hatton Mains) Ltd (0427)

Remove H67 from the plan.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure to support additional housing.

Sheena Moffat (0366)

No modification specified but it is indicated that there are concerns with the height and density of any proposed development. This will impinge on the properties situated at 41-59 Forrester Road. There is an existing tree belt within the site which offers protection to the above properties from the traffic noise and pollution from St John's Road. Will result in the loss of the existing six local businesses currently trading within the boundaries of the proposal.

Lynn Dorio (0622)

No modification specified but it is indicated that the proposal will lead to loss of view of the Pentlands and potentially impact on privacy and light to neighbouring properties. Family homes no higher than existing structures with gardens and off street parking would be more appropriate in this area. Existing trees should remain.

Anna Goodwin (0302)

No modification specified but it is indicated that the addition of residential properties above the "retail or commercial space" proposed for the ground floor could preclude the ongoing use by certain types of businesses, such as repair shops or light industry, that currently provide the important mix of use. Concerned about the height of any future development - views of the south of Edinburgh and the Pentland Hills may be lost. Should be limits imposed at this stage, so it is clear to potential developers from the outset.

**H68:Kirk Loan**

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure to support additional housing.

**H69: Corstorphine Road A.**

Gayle Green (0408), Fiona Robertson (0133), George Paver (0150), Mariel Roy (0417), Ross Urquhart (0029), Mrs Sheena Craigen (0548), Peter Niccol (0296), Nigel Green (0050)

No modification specified but it is indicated that H69 should be removed from the plan. The proposal will lead to neighbouring properties being overshadowed – loss of light and privacy.

Gayle Green (0408), Fiona Robertson (0133), George Paver (0150), Mariel Roy (0417), Ben McCready (0515), ross Urquhart (0029), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Myself and my husband, Graham Wilson (0279), Dave Campbell (0492), Peter Niccol (0296), Sarah Adamson (0523), Nigel Green (0050)

No modification specified but it is indicated that H69 should be removed from the plan. It will lead to the loss of well used/required footpath/right of way.

Fiona Robertson (0133), George Paver (0150), Ben McCready (0515), ross Urquhart (0029), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Dave Campbell (0492), Peter Niccol (0296)

No modification specified but it is indicated that H69 should be removed from the plan. There is already a lack of parking in the area – made worse by new flats

Gayle Green (0408), Allan Old (0394), Fiona Robertson (0133), George Paver (0150), Myself and my husband, Graham Wilson (0279), Nigel Green (0050)

No modification specified but it is indicated H69 should be removed from the plan. Plans to build on this site have been rejected in the past and nothing has changed to warrant a change in this decision. Reasons for rejection include building line, listed building, right of way and need for access to a long cul-de-sac, privacy and light.

Fiona Robertson (0133), George Paver (0150)

No modification specified but it is indicated that H69 should be removed from the plan. There have already been issues where emergency vehicles would have been unable to access the end of the Grove (cul-de-sac).

Mariel Roy (0417), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Sarah Adamson (0523)

No modification specified but it is indicated that H69 should be removed from the plan. The proposal would increase traffic and congestion in the area.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure to support additional housing.

Ross Urquhart (0029)

No modification specified but it is indicated that H69 should be removed from the plan, Proposals to densely populate small sites of this scale is not in keeping with the current architecture or residential footprint of Corstorphine village or the current building make up along Corstorphine road generally.

Inverdunning (Hatton Mains) Ltd (0427)

Remove H69 from the plan.

Simon Thomson (0248)

Remove H69 from the plan.

Duncan Graham (0651)

No modification specified but it is indicated that the proposal should be removed or scaled down.

Sarah Adamson (0523)

No modification specified but it is indicated that the building is currently a car hire branch which is well placed close to a large hotel. The area is a wildlife corridor.

**H70 Corstorphine Road B**

Mrs Sheena Craigen (0548)

No modification specified but it is indicated that the proposal will have an adverse effect in terms of reduced light and privacy for numbers 42-52 Downie Grove due to being overlooked. Loss of Right of Way lane to west of present Enterprise company premises. Adverse effect on Downie Grove of inevitable rise in traffic and parking.

Ross Urquhart (0029)

No modification specified but it is indicated that H70 should be removed from the plan. Proposals to densely populate small sites of this scale is not in keeping with the current architecture or residential footprint of Corstorphine village or the current building make up along Corstorphine road generally.

Duncan Graham (0651)

No modification specified but it is indicated that proposal should be removed or scaled down.

Inverdunning (Hatton Mains) Ltd (0427)

Remove H70 from the plan.

Simon Thomson (0248)

Remove H70 from the plan.

Genna Spears (0081)

No modification specified but it is indicated that there is insufficient local infrastructure to support additional housing.

Susan Stewart (0567)

No modification specified but it is indicated there are several concerns regarding development:

- Noise relating to demolition
- Noise relating to construction
- Excess waste and rubbish and where this would be stored
- Hours of construction, notably but not limited to home working / older residents / vulnerable residents who are housebound
- Dust/waste landing on residents' cars
- Dust/waste marking residents' windows/entering the property
- Light blocking and impact on daylight
- Questions over area capacity for more parking
- Impact of the noise of any additional residents from new residential or commercial units

**Summary of responses (including reasons) by planning authority:**

**Place 16: West Edinburgh**

SAICA (0590)

The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. There will also be a requirement for a phasing plan. The Council continues to work with all stakeholders on this process. The West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) are being reviewed as part of the masterplan process. Infrastructure requirements will be set out in annual action programme updates. The Council considers the wording of the West Edinburgh Development Principles to be robust and will ensure that the aims of the strategy are delivered. The Council's position in relation to primary school requirements are set out in Issue 29: Education.

**No modification proposed.**

SEPA (0012)

The Council considers that the wording at the start of criterion j. of the Development Principles, not 3.61j as referred to, reasonably reflects the provisions of Proposal BGN49 Restoration of Gogar Burn, which includes for diversion with an indicative route shown on the proposals map.

On water management, Development Principles of the Proposed Plan requires that "A Flood Risk Assessment is required and should inform the development and design/layout of the site, as shall a strategic assessment of surface water management with a view to setting out a coordinated, strategic approach to surface water management for the whole site,". Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Ratho and District Community Council (0289)

The Council's position in relation to Blue Green Network Proposals is set out in detail in issue 18. The Council's position in relation to Transport Strategy is set out in detail in issue 31. **No modification proposed.**

Rosebery Estate (Bankhead) (0618)

The Council's position in relation to healthcare contributions is set out in detail in issue 27. **No modification proposed.**

Robert Falcon (0640)

The Council's position on the spatial strategy and delivery of the strategy is set out in detail in issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council's position on economy policies is set out in detail in issue 35: Economy policies. **No modification proposed.**

West Craigs Limited (0472)

The Council's position on suggested additional greenfield sites is set out in detail in issue 9: **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council wants to see all development prioritising walking, wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs.

Criterion (g) of the West Edinburgh Development Principles state that a legible hierarchy of streets, routes and spaces designed for convenient, safe movement of pedestrians, cyclists and public transport that connects all parts of the brief area. Criteria (u)-(z) also highlight the requirements in principle of active and public transport within these sites. Paragraph 3.57 also makes it clear that the Council will coordinate a collaborative, multidisciplinary master plan approach to development across these sites. The plan reflects the aims of Scottish Planning Policy (CD096), draft NPF4 (CD099) and the National Transport Strategy 2 (CD110). The Council's position in relation to transport strategy is set out in detail in Issue 31: **No modification proposed.**

Mark Ockendon (0419)

The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. This will assess and consider any potential visual impact of future proposals through review of the West Edinburgh Landscape Framework (CD065) and the West Edinburgh Strategic Design Framework (CD070) and this work is progressing. The Council considers the wording of the West Edinburgh Development Principles to be robust and will ensure that the aims of the strategy are delivered. The Council's position in relation to transport strategy is set out in detail in Issue 31. **No modification proposed.**

Ryden LLP (0578)

The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. There will also be a requirement for a phasing plan. The Council continues to work with all stakeholders on this process. The West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) are being reviewed as part of the masterplan process. Infrastructure requirements will be set out in annual action programme updates. The Council considers the wording of the West Edinburgh Development Principles to be robust and will ensure that the aims of the strategy are delivered. The Council's position in relation to primary school requirements are set out in Issue 29: Education. **No modification proposed.**

Creos Property Limited (0253)

The wording of each of the place policies in the plan makes clear they relate to land within the individual boundaries shown on the proposals maps.

The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. There will also be a requirement for a phasing plan. The Council continues to work with all stakeholders on this process. The West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) are being reviewed as part of the masterplan process. Infrastructure requirements will be set out in annual action programme updates. The Council's position in relation to the spatial strategy is set out in detail in the response to issue 3: Delivery of the Strategy. The Council considers the wording of the West Edinburgh Development Principles to be robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)-

The position of the Scottish Government is noted. **No modification proposed.**

Shelborn Edinburgh Limited (0732)

The plan makes it clear that each of the defined places (16-23) within West Edinburgh will have their own policies and requirements. Place 19 covers Edinburgh Park/South Gyle and the plan states the Edinburgh Park/South Gyle Development Principles. Place 19 is not covered by the West Edinburgh Strategic Design Framework. Place 16 covers a specific area as described in the plan. As stated in criterion (a) of the West Edinburgh Development Principles the West Edinburgh Strategic Design Framework will be reviewed as part of the collaborative, multi-disciplinary, master plan process. **No modification proposed.**

Friends of Cammo (0387)

The plan contains a number of proposed active travel routes which are highlighted in table 8 and includes measures identified in the WETA 2016 Refresh (CD073). The future development of the active travel routes proposed will be established in conjunction with the Council's active Travel Programme (CD075) and the annually updated action programme for the plan. **No modification proposed.**

NatureScot (0528)

The Council is progressing a review of the West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) to further inform and guide proposals. This includes input from the key agencies, including NatureScot, through the Key Agency Group. The Council considers that the wording of Development Principle c. is appropriate, following on from Development Principle a. which refers to the review of the West Edinburgh Landscape Framework and West Edinburgh Strategic Design Framework. **No modification proposed.**

Cockburn Association (0777)

The Environmental Report (CD010) sets out mitigation measures, with positive environmental effects also to be seen for this area and more generally in the Blue Green Network Proposals contained in table 1.

**No modification proposed.**

Pawel Stankiewicz (0445)

City Plan (CD001) sets a framework for connectivity across the proposed allocations and development principles to inform design. The Council is progressing a review of the West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) to further inform and guide proposals in response to the development principles, including how development addresses the A8. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in issue 39. **No modification proposed.**

Crosswind Developments Ltd (0184)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in issue 39.

The wording of place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. There will also be a requirement for a phasing plan. The Council continues to work with all stakeholders on this process. The West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) are being reviewed as part of the masterplan process. Infrastructure requirements will be set out in annual action programme updates. The Council's position on the spatial strategy is set out in detail in the response to Issue 2: The Spatial Strategy and Issue 3: Delivery of the Strategy. The Council considers the wording of the West Edinburgh Development Principles to be robust and will ensure that the aims of the strategy are delivered.

This approach to development, including new roads and active travel routes will ensure that this large, complex area, which has different developers and stakeholders, can be brought forward in a cohesive and planned way and that the plan's vision for West

Edinburgh to become a vibrant, high density, mixed use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered.

The Council's position in relation to the mapping of the indicative layout of proposed roads, active travel and public transport routes in west Edinburgh is set out in detail in the response to Issue 31: Transport Strategy.

The position of school proposals and whether areas are either local or town centres shown on the Proposals Map (CD004) and Map 24 are indicative so exact alignment and definition is not critical. As any local or town centres shown are currently indicative they should not be included in either table 11 or 14. There is a limit to the amount of detail that can shown within one area in the proposals map without it becoming unreadable. The local/town centres are indicated in map 24. Issue 29: Education addresses education provision.

The title of Map 25 is West Edinburgh housing sites. It accurately identifies areas H59-H63 as areas where it is proposed that there will be housing. It does not state that there will only be housing proposed within these sites. The legend provided is also clear and does not have to be the same as that used for other plans. Paragraph 3.56 of the plan states that the vision is for West Edinburgh to become a vibrant, high density, mixed use extension to the city with a focus on place making, sustainability, connectivity, biodiversity and a strong landscape framework.

Aim 1 of the City Plan 2030 Aims requires the creation of communities linked by better active travel. Active travel includes walking as well as walking and wheeling. The Council considers the wording of Aim 1 of the City Plan 2030 Aims to be robust.

The Councils position relative to sustainable design can be found in issue 13: Sustainable Design whilst the Councils position in relation to Blue Green Infrastructure, Water and Amenity can be found in issue 16.

Issues relating to the Gogar Burn realignment are addressed in issue 18: Blue Green Network Proposals.

The Council's position in relation to affordable housing can be found in issue 23: Affordable Housing.

The Councils position in relation to the highlighted Strategic Business Centre area is addressed in issue 35: Economy Policies. **No modification proposed.**

#### Edinburgh Airport Limited (0761)

The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes will be vital to ensure that this large, complex area, which has different developers and stakeholders, can be brought forward in a cohesive and planned way and that the plan's vision for West Edinburgh to become a vibrant, high density, mixed use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered. The Council's position in relation to the mapping of the indicative layout of proposed roads, active travel and public transport



routes in west Edinburgh is set out in detail in the response to issue 31: Transport Strategy.

The position of school proposals shown on the Proposals Map and Map 24 is indicative so exact alignment is not critical. Issue 29: Education addresses education provision.

Issues relating to the Gogar Burn realignment are addressed in Issue 9: Blue Green Network Proposals. **No modification proposed.**

The Association for the Protection of Rural Scotland (0334)

The points raised are noted. Detailed issues are being considered through the review of the existing West Edinburgh Framework documents (CD065 & CD070). The plan provides for sufficient level of detail and for the review of these documents. **No modification proposed.**

Archie Clark (0003)

The current plans are indicative. The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. This and the consideration of planning applications will ensure that suitable local centres with adequate provision are provided. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in issue 39.

The Council's position in relation to the spatial strategy and delivery of the strategy is set out in detail in issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy.

The Council's position in relation to the potential transport impacts of West Edinburgh is set out in detail in the response to Issue 31: Transport Strategy.

The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. **No modification proposed.**

The Council considers that the glossary is suitably thorough. No modification is proposed, however should the reporter be minded the glossary could be updated to include TVIA to provide more clarity.

Corstorphine Community Council (0799)

The development principles for proposals are to be read as part of City Plan as a whole, including subject policies relating to these issues. The Council is satisfied that the net provision made by City Plan provides for consideration of this proposal.

Net Zero is defined in the Plan Glossary (CD001). Policy Env 8 sets out how net zero will be achieved for new buildings.

Policy Env 7 addresses this requirement. Issue 13: Sustainable Design addresses both Env 7 and Env 8.

Policy Env 34 sets out requirements in relation to air quality amongst other matters. In the course of a planning application the Council can consult with appropriate consultees to establish if/when further work is needed to support an application and assess compliance with this policy. The Council's position in respect to the transport strategy is set out in issue 31. Active travel is addressed in issue 33. Healthcare and Education are addressed in Issues 27 and 29. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 16 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

Simon Thompson (0248)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in Issue 39. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council considers the wording of place 16 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. Policy Env 9 (World Heritage Sites) would be applicable in the assessment of any application that could harm the qualities of World Heritage Sites. The Council's position relative to the historic environment is covered in detail in Issue 14: Historic Environment Policies. Building heights and landscape considerations are covered in Issue 11: Design and Placemaking. **No modification proposed.**

## **H59: Land at Turnhouse Road (SAICA)**

SAICA (0590)

Issue 29: Education addresses education considerations. **No modification proposed.**

Ryden LLP (0578)

The wording of Place 16 makes it clear that a collaborative, multidisciplinary masterplan approach to development across these sites will be required. This will consider density, scale, height and massing. It will also refine how school infrastructure shall be provided across the area. Issue 29: Education addresses education matters. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time, or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought. The Council's position in relation to infrastructure and contributions is set out in detail in Issues 27-30. **No modification proposed.**

#### **H60: Turnhouse Road**

##### Cramond & Barnton Community Council (0243)

The Council's position on the spatial strategy and delivery of the strategy is set out in detail in issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council's position on the potential transport impacts of West Edinburgh is set out in detail in the response to Issue 31: Transport Strategy. The Council's position in relation to the economy and commercial development is set out in detail in Issues 35 and 36. **No modification proposed.**

##### Mrs Patricia Stott (0349)

The Council's position on economy and commercial development is set out in detail in Issues 35 and 36. The Council's position in relation to the spatial strategy is set out in detail in the response to issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. **No modification proposed.**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position on the spatial strategy is set out in detail in the response to issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. Allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

##### Simon Thomson (0248)

The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development (CD055). The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to issue 3 Delivery of the Strategy. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought. The Council's position in relation to infrastructure and contributions is set out in detail in issues 27-30. **No modification proposed.**

**H61: Crosswinds**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in Issue 39. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Ratho and District Community Council (0289)

Matters relating to noise arising from the airport have been addressed in Issue 11: Design and Placemaking policies.

Matters relating to airport safeguarding relative to Blue Green Infrastructure are addressed in Issue 16: Blue Green Infrastructure, Water and Amenity policies.

**No modification proposed.**

Simon Thomson (0248)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. The Council's position on transport strategy is covered in Issue 31. **No modification proposed.**

Edinburgh Airport Noise Advisory Board (0691)

Matters relating to noise arising from the airport are addressed in Issue 11: Design and Placemaking policies. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can

be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position in relation to infrastructure and contributions is set out in detail in issues 27-30. **No modification proposed.**

Crosswinds Developments Ltd (0184)

The Council's position on density is set out in detail in Issue 12: Density which states the position on the combination of policies on sites. Increased density is an important factor in achieving 20 minute neighbourhoods and communities which sustain local facilities and public transport whilst making the most efficient use of the limited space the city. It ensures sites are not under-developed. Increasing density can also enhance an area's character and lead to better placemaking, providing visual focal points. It is not considered that a development is inherently unachievable by being required to meet the necessities of sustainable development such as open space, meeting the needs of affordable housing provision and being built at an appropriate density. These factors should be considered as part of the acquisition, initial layout and eventual detailed design of a development. **No modification proposed.**

West Craigs Limited (0472)

Support separate school provision at H61  
Support Noted.

**H62: Land adjacent to Edinburgh Gateway**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in Issue 39. **No modification proposed.**

West Craigs Limited (0472)

The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes will be vital to ensure that this large, complex area, which has different developers and stakeholders, can be brought forward in a cohesive and planned way and that the plan's vision for West Edinburgh to become a vibrant, high density, mixed use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered.

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020. (CD026) The capacities of sites in general is covered in Issue 20: Assessment of Housing Land Supply.

Issue 29: Education addresses education matters. **No modification proposed.**

Edinburgh Airport Noise Advisory Board (0691)

Matters relating to noise arising from the airport are addressed in Issue 11: Design and Placemaking policies. **No modification proposed.**

Crosswind Developments Ltd (0184)

The Council's position in relation to the revised vision for West Edinburgh is set out in detail in issue 39. **No modification proposed.**

**H63: Edinburgh 205**

Murray Estates (0197), SEEDCo (0198), Persimmon Homes (0495), Taylor Wimpey (0200), BDW Trading (0350), Robertson Residential Group Limited (0490)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to Issue 3 Delivery of the Strategy. The Council's position on the revised vision for West Edinburgh is set out in detail in Issue 39. **No modification proposed.**

Murray Estates (0197), SEEDCo (0198), Persimmon Homes (0495), Taylor Wimpey (0200), BDW Trading (0350), Robertson Residential Group Limited (0490), Stewart Milne Homes (0118)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to issue 3: Delivery of the Strategy. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Council's position on the revised vision for West Edinburgh is set out in detail in Issue 39. **No modification proposed.**

Ratho and District Community Council (0289)

Matters relating to noise arising from the airport are addressed in Issue 11: Design and Placemaking policies.

Matters relating to airport safeguarding relative to Blue Green Infrastructure are addressed in Issue 16: Blue Green Infrastructure, Water and Amenity policies.

**No modification proposed.**

Stirling Developments Limited (0303)

The Council's position on the revised vision for West Edinburgh is set out in detail in Issue 39. The Council's position on suggested additional greenfield sites is addressed in Issue 9: Suggested additional greenfield sites. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. The Council's position on the plans transport strategy can be found in Issue 31: Transport Strategy. **No modification proposed.**

Simon Thomson (0248)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Edinburgh Airport Noise Advisory Board (0691)

Matters relating to noise arising from the airport are addressed in Issue 11: Design and Placemaking policies. **No modification proposed.**

SEEDCo (0198)

The Council's position on the revised vision for West Edinburgh is set out in detail in Issue 39. **No modifications proposed.**

Corstorphine Community Council (0799)

Environmental Protection will be consulted in the assessment of any future application to establish what Noise Assessment is required. The Council is updating the West Edinburgh Strategic Design Framework and this will inform Noise Impact Assessment work. **No modification proposed.**

West Craigs Limited (0472)

Support separate school provision at H63  
Support noted.

**Place 17: Edinburgh Airport**

Edinburgh Airport Limited (0761)

The airport boundary is identified within the north west proposals map (CD004) as well as the online City Plan map. Place 17 makes it clear that the policy refers to the approved, or subsequently approved, master plan. The airport's internal masterplan was not approved by the Council. The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes, will be vital to ensure that this large, complex area, which has different developers and stakeholders, can

be brought forward in a cohesive and planned way and that the plan's vision for West Edinburgh to become a vibrant, high density, mixed use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered. Criterion (a) of the West Edinburgh Development Principles states that the West Edinburgh Landscape Framework (CD065) and West Edinburgh Strategic Design Framework (CD070) will be reviewed. The Council considers the wording of the policy to be robust and will enable the aims of the strategy to be achieved. The Council's position in relation to policy Env 31 is set out in detail in Issue 17: Open Space Policies. **No modification proposed.**

Lord Dalmeny (0475)

This area of land remains undeveloped and retains a countryside designation in City Plan as it currently does in the adopted Edinburgh Local Development Plan. **No modifications proposed.**

Mr Roger Thomas (0345)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced. **No modification proposed.**

Frances Guy (0589)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced. **No modification proposed.**

Robert Falcon (0640)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced. **No modifications proposed.**

SEPA (0012)

Place Policy 16 and Place Policy 17 relate to different areas. Emp 4 is a designation that covers both these areas. The Council considers it reasonable for this to be the case given these designations relate to different policy purposes.

The Council considers that the Development Principles c. j. and s. are relevant to the Gogar Burn and align sufficiently with the objective of the delivery of the Gogar Burn diversion.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance. Policy Env 35 addresses flood risk. It is an established practice to consult with



the Council's flood prevention officer through the planning application process. **No modification proposed.**

Cockburn Association (0777)

The Environmental Report (CD010) sets out the mitigation measures in question. The Council considers that these measures are clear as stated. **No modification proposed.**

L Gunstensen (0663)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced.

The Council considers it sufficiently clear that proposals are distinct from safeguards and as such it is not necessary for City Plan to set this out further.

The safeguard is addressed in the Environmental Report since the safeguard (and Place Policy 17) are both part of the City Plan which the ER has to assess. It is not for the ER to assess a hypothetical proposal beyond this since this is not what is contained in City Plan. **No modification proposed.**

Esme Clelland (0778), Jamie Wallace (0167), RSPB (0648), Anna Brand (0742), Spokes Lothian (0545)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced. **No modification proposed.**

Hallam Land Management (0615)

City Plan (CD001) was approved to go to the statutory Period of Representation by a decision of the Planning Committee on 29 September 2021. In terms of the Local Development Plan process it is therefore the settled view of the Council in the terms of Scottish Government Circular 6/2013 Development Planning. (CD116)

The safeguarding proposal remains as it does in the Adopted 2016 LDP (CD039) and was not a matter under review for City Plan. As such it did not feature as a 'main issue' in choices (CD022), nor as a matter requiring the same level of focus in the Environmental Report (CD024) as other measures in City Plan.

City Plan features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced.

The Council's position in terms of suggested additional greenfield sites is addressed in issue 9. The Council considers the wording of the policy to be robust and will enable the aims of the strategy to be achieved. **No modification proposed.**

Edinburgh Airport Noise Advisory Board (EANAB) (0720)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that the potential future use and development of land is not prejudiced.

Matters relating to airport safeguarding relative to Blue Green Infrastructure are addressed in Issue 16: Blue Green Infrastructure, Water and Amenity policies.

Matters relating to noise arising from the airport have been addressed in Issue 11: Design and Placemaking policies. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 17 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

**Place 18: Gogarburn**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 18 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

NatWest (0477)

Support Noted.

**Place 19: Edinburgh Park/South Gyle.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Government's National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2, (CD111) which supports investment in public transport. The introduction of free public transport is out with the remit of the City Plan.

The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund. (CD0153)

The Council considers that the current wording of the plan and its policies are robust and will help deliver the aims of the strategy. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

Map 7 on page 27 identifies the site correctly as housing as part of a Strategic Business Centre (LDP 2016). The current adopted Edinburgh LDP (CD039) states that the vision for Edinburgh Park/ South Gyle is to create a thriving business and residential community. It also states in the vision, that there will be a more balanced mix of uses. Place 19 also advocates a range of mixed use proposals.

The Council's position in relation to the revised vision for Edinburgh Park/ South Gyle is set out in detail in issue 39. **No modification proposed.**

Redline Planning Services Ltd (0673)

Map 26 shows that there are areas within Edinburgh Park/ Gyle Centre which are indicated for business led redevelopment, areas of mixed use redevelopment and housing led mixed redevelopment. Map 26 also shows a range of proposed active and public transport proposals. The Council considers the wording of the criterion (c ) to be robust and it will enable the aims of the policy and the overall strategy to be delivered. The Council's position in relation to suggested other sites is set out in detail in Issue 10: Suggested other sites. **No modification proposed.**

BDW Trading (0350)

The Council's position on suggested additional sites is set out in detail in Issue 10. The Council considers the wording of criterion (c ) to be robust and will enable the aims of the policy and the overall strategy to be delivered. **No modification proposed.**

Pawel Stankiewicz (0445)

The current layout indicated in map 26 of the plan has been informed by the Transport Assessment which informed the Proposed Plan strategy. Environmental protection will be consulted on any development of this scale at the project level stage and will have to comply with Policy Env 34 (Pollution and Air, Water and Soil Quality). **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance. (CD077) Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The proposed active travel and public transport proposals indicated in map 26 have been informed by the Transport Appraisal (CD014) which informed the Proposed Plan strategy. The Council considers that these measures are extensive and will enable the strategy of the plan to be delivered. **No modification proposed.**

Ambassador Group (0683)

Support is noted.

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. It is acknowledged that increased permeability is to an extent dependent on individual sites and applications coming forward. **No modification proposed.**

Shelborn Edinburgh Limited (0732)

The proposals map (CD004) clearly outlines the boundary of Edinburgh Park/South Gyle. The Council considers that map 26 is also suitably detailed and key provides the required level of information. The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). The capacities of sites in general are covered in Issue 20: Assessment of Housing Land Supply. **No modification proposed.**

Parabola Edinburgh Limited (0723)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020. The capacities of sites in general are covered in Issue 20: Assessment of Housing Land Supply. **No modification proposed.**

Archie Clark (0003)

The proposed active travel and public transport proposals indicated in map 26 of the plan has been informed by the Transport Appraisal (CD014) which informed the Proposed Plan strategy. The Council considers that these measures are extensive and will enable the strategy of the plan to be delivered. The Council considers that map 26 is suitably detailed and key provides the required level of information. **No modification proposed.** The Council does not see it necessary to update the Glossary to include a definition of Controlled Parking Zones. No modification is proposed, however, should the reporter be so minded a definition of Controlled Parking Zones could be included in the glossary for additional clarity.

Corstorphine Community Council (0799)

Further details with regards to accessibility standards will be assessed at the project level stage and will have to comply with Edinburgh Design Guidance (CD047). Any future application will also have to comply with building standards legislation. Map 26 highlights the proposed active travel and public transport measures which have been informed by the Transport Assessment which informed the Proposed Plan strategy. Criterion (d) of the Gyle Centre states that housing development should provide, or contribute towards education infrastructure, healthcare and community facilities. **No modification proposed.**

Royal Mail Group Limited (0501)

Whilst the Royal Mail Group may need their existing sites for current business requirements, those requirements may change over the life-time of the plan. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. The site also currently falls within an area which has been allocated for business led redevelopment under the adopted LDP (CD039). City Plan (CD001) also has this site as being within an area defined as being for business led redevelopment.

The Agent of Change principle puts the onus on developers of new, noise-sensitive properties to effectively deal with potentially problematic noise. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position in relation to infrastructure and contributions is set out in detail in issues 27-30. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 19 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

APAM / Bankfoot APAM (0355)

Support noted.

**Place 20: Royal Highland Centre**

Creos Property Limited (0253)

The wording of each of the place policies in the plan makes it clear that they relate to land within the individual boundaries shown on the proposals maps.

The Council will continue to work with all stakeholders in the review of the Edinburgh Framework documents (CD065 & CD070) and masterplan and phasing work. Further details will be set out in future annually updated action programmes. Further details regarding the Areas of Economic Importance, one of which the RHC lies within, are provided in Table 13.

Place 20 states that the development and enhancement of the Royal Highland Centre (RHC) will be supported within the boundary defined on the proposals map, provided proposals accord with the approved or subsequently approved masterplan. Ancillary uses will only be permitted where it can be demonstrated that these are linked to the primary activities of the RHS. The plan explains that this policy guides proposals for the further

development and enhancement of the RHC on land to the north of the A8. The policy also safeguards the site for the long term expansion of Edinburgh Airport and in turn safeguards land at Norton Park to the south of the A8 of the long term relocation of the RHC, in accordance with NPF3 (CD097).

City Plan (CD001) features a number of safeguarding designations which are appropriate and commonly used measures for LDPs and Proposals Maps. These safeguards are also included within the current adopted LDP (CD039).

The Council considers the wording of the place based policies to be robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

#### Taylor Wimpey and Hallam Land Management Ltd (0603)

Place 20 states that the development and enhancement of the Royal Highland Centre (RHC) will be supported within the boundary defined on the proposals map, provided proposals accord with the approved or subsequently approved masterplan. Ancillary uses will only be permitted where it can be demonstrated that these are linked to the primary activities of the RHS. The plan explains that this policy guides proposals for the further development and enhancement of the RHC on land to the north of the A8. The policy also safeguards the site for the long term expansion of Edinburgh Airport and in turn safeguards land at Norton Park to the south of the A8 of the long term relocation of the RHC, in accordance with NPF3. (CD097)

City Plan (CD001) features a number of safeguarding designations which are appropriate and commonly used measures for LDPs and Proposals Maps. These safeguards are also included within the current adopted LDP (CD039).

The Council considers the wording of the place based policies to be robust and will ensure that the aims of the strategy are delivered. The Council's position in relation to suggested additional greenfield sites is set out in detail in the response to issue 9: Suggested additional greenfield sites. **No modification proposed.**

#### Royal Highland & Agricultural Society of Scotland (0482)

The boundary of the RHC is clearly defined on the proposals map and it does not include the field to the north of Fairview Road. The current adopted LDP (CD039) also does not include this field as part of the RHC.

The Council considers the wording of place policy 20 and table 13 to be robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

#### SEPA (0012)

The wording of the Place Policy is clear in supporting the development and enhancement of the Royal Highland Centre and also safeguards against development which would prejudice the use of this land for future airport expansion. The Council considers the two objectives can be accommodated together and are sufficiently clearly set out.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance

(CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Mr Roger Thomas (0345)

City Plan (CD001) features a number of safeguarding designations (such as the second airport runway) which are appropriate and commonly used measures for LDPs and Proposals Maps. Safeguards ensure that a potential future use and development of land is not prejudiced. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 20 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

### **Place 21: Riccarton University Campus and Business Park**

Heriot Watt University (0468)

The Council considers the wording of Place Policy 21 and Table 13 to be robust and will ensure that the aims of the strategy are delivered. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 21 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

### **Place 22: Maybury**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2, (CD111) which supports investment in public transport.

The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The introduction of free public transport is out with the remit of the City Plan.

The Council considers that the current wording of the plan and its policies are robust and will help deliver the aims of the strategy. **No modification proposed.**

West Craigs Limited (0472)

Housing land audits are carried out annually, agreed with Homes for Scotland as the representative of housing developers (CD055). Updates for 2022 will be published in due course. **No modification proposed.**

Rosebery Estate (Bankhead) (0618)

The objection to WE12 is noted. WE12 is identified in the Plan (CD001) as a potential option. WE1 is currently being progressed in discussion with the redesign of Maybury Junction (R7). The Council considers that the criterion (m) should remain as it has been informed by the plan's Transport Appraisal (CD014) and is part of the ongoing West Edinburgh Transport Improvement Programme (WETIP) (CD072).

The Council's position on Transport contributions is addressed in Issue 30: Infrastructure Delivery- Transport. The Council's position on healthcare infrastructure is addressed in Issue 27: Infrastructure Delivery and Developer Contributions. The Council's position on the revised vision for West Edinburgh is set out in detail in Issue 39. **No modification proposed**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

The wording of the introduction of Place Policy 22 is grammatically correct. **No modification proposed.**

Archie Clark (0003)

The active travel and public transport proposals indicated in map 27 have been informed by the Transport Appraisal (CD014) which informed the Proposed Plan strategy. HSG 20 (Cammo) is no longer shown, as development on site has largely been completed. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council wants to see all development prioritising walking, wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs.

The plan reflects the aims of Scottish Planning Policy (CD096), draft NPF4 (CD099) and the National Transport Strategy 2 (CD110). The Council's position in relation to transport strategy is set out in detail in Issue 31: Transport Strategy. **No modifications proposed.**

Corstorphine Community Council (0799)

The active travel and public transport proposals indicated in Map 27 have been informed by the Transport Appraisal (CD014) which informed the Proposed Plan strategy. Criterion (m) requires high quality pedestrian and cycle routes within the site and criterion (b) and (c) also refer to active travel improvements. **No modification proposed.**

The Association for the Protection of Rural Scotland (0334)



Place Policy 22 states that the housing site was allocated for development and removed from the greenbelt in the Edinburgh Local Development Plan (2016) (CD039). Map 27 is indicative. Paragraph 3.68 states that comprehensive master planning and phasing of development will be required, drawing upon place making and street design principles. **No modification proposed.**

Pawel Stankiewicz (0445)

The current layout indicated in map 27 of the plan has been informed by the Transport Appraisal (CD014) which informed the Proposed Plan strategy. **No modification proposed.**

SEPA (0012)

The Council agrees that it is not proposed for the Gogar Burn realignment to be routed through this site. City Plan does not indicate this. **No modification proposed.**

Cramond & Barnton Community Council (0243)

A significant level of work is still to be carried out within the site to produce housing completions. It is therefore valid that Place Policy 22 is included within the proposed plan to guide any revised proposals. **No modification proposed.**

Mrs Patricia Stott (0349)

A significant level of work is still to be carried out within the site to produce housing completions. It is therefore valid that Place Policy 22 is included within the proposed plan to guide any revised proposals. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position in relation to infrastructure and contributions is set out in detail in issues 27-30. **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 22 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

RSPB (0648)

Support for text in section 3.68c noted.

## **Place 23: Builyeon Road**

### Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The introduction of free public transport is out with the remit of the City Plan.

The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of the plan and its policies are robust and will help deliver the aims of the strategy. **No modification proposed.**

### Archie Clark (0003)

Place Policy 23 states that the housing site was allocated for development and removed from the greenbelt in the Edinburgh Local Development Plan (2016) (CD039). It has therefore already been subject to the Examination process. **No modification proposed.**

### Queensferry & District Community Council (0568)

Place Policy 23 states that the housing site was allocated for development and removed from the greenbelt in the Edinburgh Local Development Plan (2016) (CD039). It has therefore already been subject to the Examination process.

Criterion (a) of the Builyeon Road development principles is to address the education mitigation measures and transport mitigation measures. A masterplan has now been approved for the site (16/01797/PPP) (CD156) & (21/04019/AMC) (CD157). These matters will also be addressed at the project level stage. **No modification proposed.**

### Living Streets Edinburgh Group (0486)

The Council wants to see all development prioritising walking, wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs.

The plan reflects the aims of Scottish Planning Policy (CD096), draft NPF4 (CD099) and the National Transport Strategy 2 (CD110). The Council's position on transport strategy is set out in detail in Issue 31: Transport Strategy. **No modification proposed.**

### Pawel Stankiewicz (0445)

Environmental Protection will be consulted on any development of this scale at the planning application stage and the development will have to comply with Policy Env 34 (Pollution and Air, Water and Soil Quality). **No modification proposed.**

Anna Goodwin (0302)

The Council considers the wording of place 23 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

#### **HSG4: West Newbridge**

Ratho and District Community Council (0289)

Matters relating to airport safeguarding relative to Blue Green Infrastructure are addressed in Issue 16: Blue Green Infrastructure, Water and Amenity policies.

**No modification proposed.**

Jansons Property (0733)

HSG 4 was allocated for housing development in the Edinburgh Local Development Plan (2016) (CD039). It has therefore already been subject to the Examination process. **No modification proposed.**

#### **HSG 5: Hillwood Road**

Ratho and District Community Council (0289)

HSG 4 was allocated for housing development in the Edinburgh Local Development Plan (2016) (SC039). It has therefore already been subject to the Examination process. Table 2 in the plan confirms that environmental concerns such as the proximity of the site to nearby sources of noise, including aircraft noise, must be addressed through a comprehensive masterplan for the whole site. **No modification proposed.**

#### **HSG7: Edinburgh Zoo**

Genna Spears (0081)

HSG 7 was allocated for housing development in the Edinburgh Local Development Plan (2016) (CD039). It has therefore already been subject to the examination process. **No modification proposed.**

Robin Knops (0494)

HSG 7 was allocated for housing development in the Edinburgh Local Development Plan (2016) (CD039). It has therefore already been subject to the examination process. **No modification proposed.**

Peter Wilkinson (0493)

HSG 7 was allocated for housing development in the Edinburgh Local Development Plan (2016) (CD039). It has therefore already been subject to the Examination process. Table 2 in the plan highlights that a flood risk assessment is required and should inform the development and layout of the site. **No modification proposed.**

#### **H64: Land at Ferrymuir**

##### Queensferry & District Community Council (0568)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. **No modification proposed.**

##### Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

##### Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### **H65: Old Liston Road**

##### Robyn Mackay (0005)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of these material considerations will also need to be considered at the planning application stage. **No modification proposed.**

#### **H66: St. Johns Road (A)**

##### Duncan Graham (0651)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). The capacities of sites in general is covered in Issue 20: Assessment of Housing Land Supply. Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D

sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of these material considerations will also need to be considered at the planning application stage. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position on infrastructure and contributions is set out in detail in issues 27-30. **No modification proposed.**

**H67: St. Johns Road (B)**

Sheena Moffat (0366)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). The capacities of sites in general is covered in Issue 20: Assessment of Housing Land Supply. Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a principles which relates to the provision of an active frontage. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Lynn Dorio (0622)

All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Anna Goodwin (0302)

All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position on infrastructure and contributions is set out in detail in Issues 27-30. **No modification proposed.**

Duncan Graham (0651)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD002). The capacities of sites in general is covered in Issue 20:

Assessment of Housing Land Supply. Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD026). Appendix D sets out a principle which relates to the provision of an active frontage. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

**H68:Kirk Loan**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position on infrastructure and contributions is set out in detail in Issues 27-30. **No modification proposed.**

**H69: Corstorphine Road A.**

Gayle Green (0408), Fiona Robertson (0133), George Paver (0150), Mariel Roy (0417), Ross Urquhart (0029), Mrs Sheena Craigen (0548), Peter Niccol (0296), Nigel Green (0050)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD026). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Gayle Green (0408), Fiona Robertson (0133), George Paver (0150), Mariel Roy (0417), Ben McCready (0515), ross Urquhart (0029), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Myself and my husband, Graham Wilson (0279), Dave Campbell (0492), Peter Niccol (0296), Sarah Adamson (0523), Nigel Green (0050)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD026). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Fiona Robertson (0133), George Paver (0150), Ben McCready (0515), ross Urquhart (0029), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Dave Campbell (0492), Peter Niccol (0296)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD026). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Gayle Green (0408), Allan Old (0394), Fiona Robertson (0133), George Paver (0150), Myself and my husband, Graham Wilson (0279), Nigel Green (0050)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD026). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. Every application is determined on its own individual merits. **No modification proposed.**

Fiona Robertson (0133), George Paver (0150)

The spatial strategy has been informed by the Transport Appraisal process (CD014). All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Mariel Roy (0417), Kirsten Mackie (0529), Mrs Sheena Craigen (0548), Sarah Adamson (0523)

The spatial strategy has been informed by the Transport Appraisal process (CD014). All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position on infrastructure and contributions is set out in detail in Issues: 27-30. **No modification proposed.**

Ross Urquhart (0029)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Duncan Graham (0651)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. Every application is determined on its own individual merits. **No modification proposed.**

Sarah Adamson (0523)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

**H70 Corstorphine Road B**



Mrs Sheena Craigen (0548)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Ross Urquhart (0029)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Duncan Graham (0651)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position on the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is considered in the Council's response to Issue 20 Assessment of Housing Land Supply. **No modification proposed.**

Genna Spears (0081)

Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought.

The Council's position in relation to infrastructure and contributions is set out in detail in issues 27-30. **No modification proposed.**

Susan Stewart (0567)

Table 2 of the plan states that development should accord with the development principles as set out in Appendix D (CD002). Appendix D sets out a variety of principles relating to design and amenity that any future development will have to accord with. All of the material considerations listed will need to be considered at the planning application stage. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 7	Proposed Sites: South West Edinburgh.	
Development plan reference:	Part 3: pages 84-92, part 4: Table 2 pages 162- 163.	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Anna Durlo (0039) Archie Clark (0003) Caledonian Packaging Ltd (0635) Chesser Engineering Ltd (0369) Chris Brown (0051) Cockburn Association (0777) Cordatus Property LP (0533) Defence Infrastructure Organisation (0124) Denise Hill (0637) Frederick Innes (0088) Gordon Miller (0520) Gym Juniors (0762) Hallam Land Management (0615) Inverdunning (Hatton Mains) Ltd (0427) Isabel Brown (0087)</div><div>Juniper Green &amp; Baberton Mains Community Council (0306) Living Streets Edinburgh Group (0486) Mark Ockendon (0419) Mr Archie Clark (0003) NatureScot (0528) Pawel Stankiewicz (0445) Richard Marsh (0165) Richard Parkinson (0422) Royal Mail Group Limited (0501) SEPA (0012) Simon Thomson (0248) Telereal Trillium (0540) Wester Hailes Land and Property Development Company (0064)</div></div></div>		
Provision of the development plan to which the issue relates:	This section of the plan sets out place policies and identifies housing proposals in South West Edinburgh.	
Planning authority's summary of the representation(s):		
<p><b><u>HSG31: Curriemuirend. (Place 24)</u></b></p> <p><u>Hallam Land Management (0615)</u></p> <p>Hallam objects to the place proposals for South-West and West Edinburgh.</p> <p>Balerno does not feature in any settlement or place policy despite being in South West Edinburgh. The whole South West Edinburgh section appears to cover South East and South West. It is confusing, inconsistent and incoherent. This section on South West Edinburgh needs a complete review and review of Balerno before any decisions on a finalised plan is made.</p> <p>Many of the sites identified for high density development are new allocations and will compete for limited infrastructural capacity. They are not preferable to alternative locations in South West Edinburgh.</p> <p>There has been a significant change in proposals by the Council when considering proposals for West and South-West Edinburgh.</p> <p><u>Juniper Green &amp; Barberton Main Community Council (0306), Archie Clark (0003)</u></p>		

Inappropriate site. Site is green space that is needed by local community. Site should be retained in its entirety as a public park and used for recreational purposes.

Gordon Miller (0520)

Inappropriate site. Site is green space that is needed by local community. Site should be retained in its entirety as a public park and used for recreational purposes. Curriemuirend Park is a Millennium Woodland supporting a wide variety of plant and animal life. The park should be retained in line with Edinburgh Council's own Biodiversity Action Plan. A survey against Edinburgh Council's notable Species List should be prioritised.

Pawel Stankiewicz (0445)

Shouldn't be developed to preserve the biodiversity of the semi-mature park also as an amenity for the surrounding area and to not increase the number of people living in noise and pollution from the Edinburgh bypass.

Living Streets Edinburgh Group (0486)

No objection to inclusion of site but pedestrian priority and a largely car free development should be an underpinning principle.

Anna Durlo (0039)

Support allotments but not new housing as this will remove part of green area, which is crucial for reducing noise and pollution from the bypass, the noise and pollution levels are already quite high. Reduce Wester Hailes Road to a single lane carriage which will increase traffic. Close a slip road, which will increase pollution from traffic on by-pass and Wester Hailes Road.

SEPA (0012)

No flood risk assessment (FRA) is required, but review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site -this should be investigated further.

Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

**H71: Gorgie Park Close**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owner's but an exercise carried out by Pegasus suggests

there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

Royal Mail Group Limited (0501)

The Royal Mail assets listed (including 3 Gorgie Park Road, EH14 1NL) are all allocated for residential development. These properties are important assets for Royal Mail and there is no short, medium- or long-term interest or intention in relocating the Delivery Offices to an alternative location. The housing allocations proposed at each of these sites are therefore not considered to be deliverable and should be removed from the emerging Local Development Plan. Proposed housing would also not be compatible with Royal Mail operations in terms of potential noise and disturbance to residents.

**H72: West Gorgie Park**

Chesser Engineering Ltd (0369)

Council have not provided information or support for businesses that would have to relocate. Suitable land for relocation (within City bypass) is not being provided. Site is being allocated but council have no plans to actively deliver it.

**H73: Gorgie Road (Caledonian Packaging)**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence.

Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Caledonian Packaging Ltd (0635)

A red area has been marked and described as belonging to Caledonian Packaging. Whilst not particularly clear the area marked covers at least seven separate owners.

Frederick Innes (0088)

There are two areas incorrectly shown as part of the plan for reference H73. a washhouse which adjoins the building number 499 and a garden which is adjacent to the aforementioned washhouse and the building number 499. These are privately owned by habitations 499A and 501 jointly. The proposed plan is incorrect by including these two areas.

SEPA (0012)

A flood risk assessment (FRA) is requested in Proposed Plan Appendix D, and SEPA agrees this is necessary. A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site will likely be constrained due to flood risk and may not be suitable for residential development. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site - this should be investigated further.

**H74: Craiglockhart Avenue.**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Denise Hill (0637)

Development sympathetic to the canal side setting would be welcome – following concerns: Development should not exceed the two storey level of current commercial buildings on the site, and be designed to minimise overlooking into the gardens and windows of the properties on Craiglockhart Gardens directly backing onto the site, in order not to shadow and to preserve privacy of current residents. Development on the proposed

site must address the pressure on local sewerage/ drains and ideally facilitate a solution to the existing flooding issues. Parking in Craiglockhart Gardens and surrounding streets will be increasingly burdened as a result of developments adjacent on Craiglockhart Avenue and Slateford Road. Any new development must take parking requirements and impacts into account

Richard Parkinson (0422)

The proposed development must ensure consideration is given to: The impact of the development on drainage. The impact of the development on traffic. Safe pavements in the area.

SEPA (0012)

The site is elevated above the Water of Leith, and no flood risk assessment (FRA) is likely to be needed from this source of flooding. However, the site appears to be directly adjacent and below the Canal. Reference made to flooding in basements of Allan Park Drive and the source could be from the canal. Consideration should be given to the risk the canal poses and contact should be made with Scottish Canals, especially if surface water is to be discharged to the canal as suggested in the draft SFRA.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site - this should be investigated further.

#### **H75: Lanark Road**

Telereal Trillium (0540)

Welcomes the housing-led site designation under H75 for the TT site at Craiglockhart Avenue West, but objects to the naming as "Lanark Road". This is misleading. Requests the re-naming to Craiglockhart Avenue West site.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

The site appears to be directly adjacent and below the Canal. Consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Consider including this source of

flooding within the Site assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site – this should be investigated further.

### **H76: Peatville Gardens**

Isabel Brown (0087), Chris Brown (0051)

This development will overlook my property in Peatville Terrace and will overshadow my light in my bedroom, kitchen and conservatory and my garden. Privacy in my house and garden will be compromised and I will be subjected to noise from the development, the dust, and demolition of the kings knows pub. We will be subjected to noise from people parking cars, making noise in gardens.

Planning permission for development here has already been refused.

SEPA (0012)

The site appears to be directly adjacent and below the Canal. Consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Consider including this source of flooding within the Site assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site – this should be investigated further.

### **H77: Gorgie Road (east) Place 25**

Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Telereal Trillium (0540)

Welcome the housing-led site designation under H77 for Gorgie Road East. Request an amendment after para 3.72 to acknowledge the opportunity for brownfield sites such as this to be subject to a viability proving exercise.

SEPA (0012)



A flood risk assessment is not requested in Appendix D but we advise that one is needed. In section 3.72j reference is made to the Water of Leith flood extent and how it may cause surface water flooding. We advise that this is reworded to avoid confusion between fluvial (from the river) and surface water flooding.

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

Living Streets Edinburgh Group (0486)

Statement e of Place Policy 25 is supported but should be reinforced by clarifying circumstances for very limited car parking. Should also get contributions to pedestrian infrastructure as required around the site.

Inverdunning (Hatton Mains) Ltd (0427)

On map 29, references H71, H77 and H78 should be replaced with "Place 25". Support Place-based approach taken by City Plan 2030 but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. Many proposed sites are potential windfall only with no commitment to housing.

**H78: Stevenson Road (A) Place 26**

Gym Juniors (0762)

Business employs between 15 - 20 people and provides leisure facilities to over 1,000 local families in West Edinburgh. - Any redevelopment of this area should include the provision of this type of amenity to the local community, as part of any plans.

Cordatus Property LP (0533)

Propose amendments to H78 allocation in terms of site capacity and density levels.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

#### SEPA (0012)

Flood risk assessment (FRA) is requested in Proposed Plan Appendix D, and SEPA agrees that this is necessary.

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site will likely be heavily constrained due to flood risk and the council may wish to remove the allocation. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

#### Living Streets Edinburgh Group (0486)

Statement e of Place Policy 26 is supported but should be reinforced by clarifying circumstances for very limited car parking. Should also get contributions to pedestrian infrastructure as required around the site.

#### Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

#### **H79: Broomhouse Terrace, Place 27**

#### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Section 3.74, bullet b. - "Create a record of any heritage asset identified for demolition." It is unclear if the creation of a record is intended to offer any protection to that heritage asset, or to facilitate its demolition.

Bullet d. refers to the creation of a mobility hub which should incorporate a bike/e-bike cycle hire point and car-share opportunities. These should be included at other mobility hubs too.

#### Living Streets Edinburgh Group (0486)

Statement g of Place Policy 27 is supported but should be reinforced by clarifying circumstances for very limited car parking. Should also get contributions to pedestrian infrastructure as required around the site.

#### SEPA (0012)

The strategic flood risk assessment indicated this would be the location for a strategic SUDS feature on-site but there is no information on such a proposal for Place 27. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further.

Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

**H80: Murrayburn Road, Place 28**

Living Streets Edinburgh Group (0486)

Statement f of Place policy 28 is supported but should be reinforced by clarifying circumstances for very limited car parking. Should also get contributions to pedestrian infrastructure as required around the site.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

On page 89, Place 28 Murrayburn Road, no map is provided. It would help if a map was provided for each Place.

Page 90 Section 3.75 i. "Locate and design new greenspace and green-blue infrastructure to link to existing grlnf networks and natural habitats." - it is unclear what is intended by "grlnf".

Page 90, section 3.75 l. "Investigate Murray Burn culvert location/condition/capacity to see how/if development should account for this and incorporate it into the layout it as an opportunity" This appears incomplete.

Wester Hailes Land and Property Development Company (0064)

Disappointing Procedure in Notifying Tenants - WHLPD currently holds 125-year-long ground leases for Site H81 and part of site H80 yet we were not approached nor informed by the council regarding their proposals before our tenants were.

Site Suitability - Dumbryden Industrial Estate has a history of drainage issues which have required significant attention over the years.

Edinburgh Employment and Loss of Income – Site is home to a number of businesses. Proposal would lead to increased unemployment and increased poverty. Potential Loss of Childcare Provision - WHLPD currently lease a building in Wester Hailes to Smilechildcare on a community rent of £1 per annum. This would be put a t risk if WHLPD loses income from the industrial estates. Potential Impact on Religious Observance and Community Growth - WHLPD currently lease a building in Wester Hailes to the Redeemed Christian Church of God Open Heavens Edinburgh (RCCGOHE) on a community rent of £1 per annum. This would be put a t risk if WHLPD loses income from the industrial estates.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council only own part of the land. The Council have not been in touch with the other owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from

business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### SEPA (0012)

Sections 3.75 k and l need to be clarified. One suggests mitigation, which is difficult to achieve without a good understanding of the risk, and the other is requesting investigation into the location/condition/capacity of the Murray Burn culvert to inform layout. This policy needs to be recast with a strategic and holistic approach to take account of the challenges and opportunities of the site.

A flood risk assessment (FRA) is requested in Proposed Plan Appendix D, and SEPA agrees this is necessary and should assess the risk from the Murray Burn which is culverted beneath or adjacent to the site.

There is limited information available on the location and flood risk associated with the Murray Burn and the site may be heavily constrained due to flood risk and the council may wish to remove this allocation.

Due to the large number of allocations along the Murray Burn we would recommend the council take a holistic approach and determine the flood risk from this source to inform suitable development types and locations.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further

#### Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

#### **H81: Drumbryden Drive, Place 29**

##### Wester Hailes Land and Property Development Company (0064)

Disappointing Procedure in Notifying Tenants - WHLPD currently holds 125-year-long ground leases for Site H81 and part of site H80 yet we were not approached nor informed by the council regarding their proposals before our tenants were.

Site Suitability - e. Hailes Park Industrial Estate is situated upon a former landfill site - it was necessary to build on top of a methane membrane to prevent the release of harmful gases into the atmosphere. As a result, there is an inability to bore down so far into the grounds to prevent puncture.

Edinburgh Employment and Loss of Income – Site is home to a number of businesses. Proposal would lead to increased unemployment and increased poverty.

Potential Loss of Childcare Provision - WHLPD currently lease a building in Wester Hailes to Smilechildcare on a community rent of £1 per annum. This would be put at risk if WHLPD loses income from the industrial estates.

Potential Impact on Religious Observance and Community Growth - WHLPD currently lease a building in Wester Hailes to the Redeemed Christian Church of God Open Heavens Edinburgh (RCCGOHE) on a community rent of £1 per annum. This would be put at risk if WHLPD loses income from the industrial estates.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

Living Streets Edinburgh Group (0486)

Statement e (sic) of Place policy 29 is supported but should be reinforced by clarifying circumstances for very limited car parking. Should also get contributions to pedestrian infrastructure as required around the site.

Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

**H82: Murrayburn Gate**

SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

#### **H84: Calder Estate**

##### SEPA (0012)

Flood risk assessment (FRA) is requested in Proposed Plan Appendix D, and SEPA agrees this is necessary.

An FRA which assesses the risk from the Murray Burn, which is culverted beneath or adjacent to the site, is necessary. There is limited information available on the location and flood risk associated with the Murray Burn and the site may be constrained due to flood risk. Due to the large number of allocations along the Murray Burn we would recommend the council take a holistic approach and determine the flood risk from this source to inform suitable development types and locations. The draft SFRA mentioned connecting to the watercourse by building blue/green corridors however without a good understanding of the Murray Burn, this would not be achievable.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

#### **H85: Redford Barracks, place 30**

##### Defence Infrastructure Organisation (0124)

Welcomes the allocation of Redford Barracks for housing led mixed-use development and the significant contribution it would make toward delivering the city's spatial strategy around 20-minute walkable neighbourhoods and maximising the use of brownfield land. Welcomes the aspiration that development allocations will come forward as housing led, high density, mixed use neighbourhoods to provide homes, jobs and facilities around existing infrastructure.

As a result of necessary basing changes, the disposal of Redford Cavalry Barracks and Redford Infantry Barracks will both be delayed by four years from 2025 to 2029. The DIO supports the principle of Place 30 Redford Barracks but would like some amendments.

The DIO supports the identified capacity of site H85 as 800 units, although this is considered to be appropriate as 'a minimum'. Our own analysis of the site's potential and development opportunities identifies that it can deliver a significant element of new residential development provided in a mix of refurbished heritage buildings and new development plots. In doing so the site can deliver a variety of residential types and densities including opportunities for apartments, terraces, townhouses, suburban residential types as well as opportunities for other forms of residential types including affordable housing, housing for the elderly etc.

##### Richard Marsh (0165)

Development should be in keeping with historic nature of Colinton village and should not impede views of Arthur's Seat.

##### NatureScot (0528)

Generally support the requirements in principle for the Redford Barracks site, particularly the clear emphasis on the need for a master plan, which development must accord with.

Welcome the requirements of Development Principle i) but unclear on how this is to be achieved.

The Development Principles are currently weak on green blue network opportunities at this site. It will therefore be difficult to meet the requirements of Policy Env 3 Development Design and Policy Env 6 Green Blue Infrastructure.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of businesses would result in lack of jobs or further land needed to relocate businesses.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Page 92 - Place 30 Redford Barracks - a map would be useful.

The statement in 3.75 f., "Retention of existing streets which are lined by the stables blocks plus other key routes through the site. The frontages to many of these streets need to be improved to make them more attractive." This needs to be carefully monitored to ensure it meets what should be the primary principle: "A development which respects the heritage of the site."

Concerning the continuation of section 3.75 b, to, "New uses for all listed buildings - and their settings - within and adjacent to the site must be an integral part of future development proposals. Any new buildings should have a positive relationship with existing listed buildings in terms of height." we would add "materials and appearance".

Archie Clark (0003)

A detailed map should be included as one stated development principle is: "Retention and enhancement of Redford recreation park to the southeast of the site and provision of a new community park (See proposal BGN 27) and play space in line with criterion (m) below." "The development shall provide new outdoor play facilities as necessary to ensure all homes in the site are adequately served Play facilities in line with the Play Access Standard set out in the Open Space Strategy (OSS). The new outdoor play facilities to be integrated into the site layout in a well overlooked and accessible location with a welcoming setting. These new facilities shall provide for a range of users, including those with disabilities..."

Living Streets Edinburgh Group (0486)

No objection to the site in principle, but there is only reference to active travel, not to pedestrian priority. This development should be no different from others, regardless of its location and mixed use status. Pedestrians must have priority throughout and development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

#### SEPA (0012)

Support there being a flood risk assessment as stated in Appendix D. SEPA commented on this site as part of a Place Brief in July 2019 (SEPA Reference. PCS166169). We advised that the Braid Burn to the south and east of the site has previously overtopped its banks and flowed down Redford Road and nearby streets, before entering the Water of Leith. Although this should arguably occur less frequently with the construction of a Flood Protection Scheme. Since 2000, many streets in the area have been affected by flooding. Due to the large area identified as potentially vulnerable to surface water flooding, this would require careful consideration to ensure existing property and proposed property and infrastructure are not at increased risk of flooding. We would note that development may be constrained at this location. Although there may be an opportunity here to reduce surface water flooding to existing areas. As the standard of protection offered by the Braid Burn Flood Protection Scheme is unknown we would recommend an FRA is undertaken to inform development type and layout. The draft SFRA identifies that reported flooding should be considered in an FRA with opportunities for wider surface water interactions and the use of green infrastructure.

Note there is no reference to sustainable urban drainage systems (SUDS). Multi-functional blue green infrastructure should be employed onsite and connectivity to wider green-blue networks made in line with CEC Sustainable Rainwater Guidance. 'Natural flow paths of water must be identified at the visioning stage and inform design.

#### Inverdunning (Hatton Mains) Ltd (0427)

Site not available in plan period with disposal by MoD not until 2029.

#### Mark Ockendon (0419)

Rather than degrading people's quality of life (presumption against cars), focus on improving the alternatives (increase quality of life). Should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights.

#### Cockburn Association (0777)

Overall, we welcome the general principles for the repurposing of this site. However, all existing green spaces should be retained and enhanced for public and climate mitigation benefit and all existing trees should be protected as a matter of principle. We would also advocate the removal of large areas of hardstanding where not required and their return to green space. Substantial levels of new tree planting should form part of any development masterplan.

#### **Modifications sought by those submitting representations:**



### **HSG31: Curriemuirend. (Place 24)**

#### **Hallam Land Management (0615)**

No modification specified but it is indicated that Balerno should feature in settlement or place policies. This section on South West Edinburgh needs a complete review and review of Balerno before any decisions on a finalised plan is made. There has been a significant change in proposals by the Council when considering proposals for West and South-West Edinburgh.

#### **Juniper Green & Barberton Main Community Council (0306), Archie Clark (0003)**

No modification specified, however, it is indicated that Juniper Green and Baberton Mains Community Council herewith wishes to register itself as a key stakeholder regarding this site and requires involvement in any consultation regarding the development of a Place Brief for this site. Despite proposals being considered premature, section 3.71 continues with a list of "Curriemuirend Development Principles" which include references to "allotments", "active street frontage along Wester Hailes Road" and "reduce the width of Wester Hailes Road". The specific nature of these seems to conflict with the statement that they are premature. JG&BMCC submitted a detailed objection at LDP2016 stage that still applies: that the site should be retained in its entirety as a public park. We understand this site is registered in the 'housing account' books when it should be in the 'parks department' books. Correcting this anomaly would help ensure this valuable piece of greenspace was retained for recreational purposes.

#### **Gordon Miller (0520).**

Remove Curriemuirend Park from the selected boundary area for 'Place 24' and the actual area to be used for housing restricted to the street frontage on Wester Hailes Road.

#### **Pawel Stankiewicz (0445)**

The lead on page 84 instead of "Planning permission will be granted for development within the boundary of Curriemuriend..."it should be "Planning permission will not be granted for development within the boundary of Curriemuriend Park"

Paragraph c p. 84 should be struck off

Paragraph f p. 84 should be struck off

No other modification specified but it is indicated that development should create an active street frontage along Wester Hailes Road to not increase the number of people living in noise and pollution. Attractiveness and safeness is determined mainly by number of cars and their speed and not by road width.

#### **Living Streets Edinburgh Group (0486)**

No modification specified but it is indicated that regardless of what has been built in the past on nearby sites, development should be expected to follow the same principles as proposed elsewhere in the city, designed accordingly, and contributions secured to carry

out the necessary enhancements to public transport, pedestrian and cycle infrastructure thereby reflecting the transport hierarchy. If this is not made clear at the outset, we will see more of the same old unsatisfactory development which generates more traffic onto surrounding roads and priorities cars above people. It is critical that the plan is consistent in reflecting Scottish Planning Policy and the National Transport Strategy throughout.

Anna Durlo (0039)

No modifications specified but it is indicated that HSG 31 should be removed from the plan.

SEPA (0012)

No modification specified but it is indicated a review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site and this should be investigated further.

Mark Ockendon (0419)

Add a new requirement: "Ensure support for low-carbon vehicles by providing electric vehicle charging points for new private housing, and on-street parking."

### **H71: Gorgie Park Close**

Inverdunning (Hatton Mains) Ltd (0427) Simon Thomson (0248)

Delete H71 from the plan.

SEPA (0012)

No modification specified but it is indicated that a review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

Royal Mail Group Limited (0501)

The sites owned by Royal Mail should be re-allocated as Business and Industry Areas under Policy ECON4 of the plan.

If the Council see fit to retain any proposals for residential use on the land adjoining the properties set out in the representation (assuming the allocation pertaining to each site is removed), the relevant policies and the associated information set out in Appendix D of the Local Plan should make reference to Royal Mail's operations and should ensure that any necessary mitigation is provided by the applicant at the application stage to guarantee that there is no undue impact to Royal Mail.

### **H72: West Gorgie Park**

Chesser Engineering Ltd (0369)

No modification specified but it is indicated that it is incredibly useful having a business within the city and easily accessible. The allocated land for business relocation is in

Newbridge. Any reasonable individual would not claim this land is within the city. It is wholly unsuitable for our business and our employees.

### **H73: Gorgie Road (Caledonian Packaging)**

Inverdunning (Hatton Mains) Ltd (0427) Simon Thomson (0248)

Delete H73 from the plan.

Caledonian Packaging Ltd (0635)

No modification specified but it is indicated that a red area has been marked and described as belonging to Caledonian Packaging. Whilst not particularly clear the area marked covers at least seven separate owners.

Frederick Innes (0088)

H73 needs to be redrawn to exclude private areas owned by 499A and 501.

SEPA (0012)

No modification specified but it is indicated that a review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

### **H74: Craiglockhart Avenue.**

Inverdunning (Hatton Mains) Ltd (0427) Simon Thomson (0248)

Delete H74 from the plan.

Denise Hill (0637)

No modification specified but it is indicated that concerns relating to building heights, flooding and parking should be considered.

Richard Parkinson (0422)

No modification specified but it is indicated that concerns relating to drainage, traffic and safe pavements should be considered.

SEPA (0012)

No modification specified but it is indicated that consideration should be given to the risk the canal poses and contact should be made with Scottish Canals, especially if surface water is to be discharged to the canal as suggested in the draft SFRA. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

### **H75: Lanark Road**

Telereal Trillium (0540)

Requests the re-naming to Craiglockhart Avenue West site.

No other modification specified but indicates that these endorsements are subject to all the other representations made by TT on the need for opportunities for brownfield sites to present site viability evidence which could impinge on deliverability of the site

Inverdunning (Hatton Mains) Ltd (0427) Simon Thomson (0248)

Delete H75 from the plan.

SEPA (0012)

No modification specified but it is indicated that consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Consider including this source of flooding within the Site assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

**H76: Peatville Gardens**

Isabel Brown (0087),

No modification specified but it is indicated that H76 should be removed from the plan due to overshadowing, privacy, noise and disruption concerns.

Chris Brown (0051)

No modification specified but it is indicated that H76 should be removed from the plan due to overshadowing, privacy, noise and disruption concerns as well as loss of jobs and community facilities.

SEPA (0012)

No modification specified but it is indicated that consideration should be given to the risk the canal poses and contact should be made with Scottish Canals. Site layout and design should take account of this risk. Consider including this source of flooding within the Site assessment. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

**H77: Gorgie Road (east) Place 25**

Mark Ockendon (0419)

Remove Place 25, Gorgie Road East Development Principle criterion (e). Replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street"

Simon Thomson (0248)

Delete H77 from the plan.

Telereal Trillium (0540)

Amendment after para 3.72 to acknowledge the opportunity for brownfield sites such as this to be subject to a viability proving exercise - to emphasise the need to fully investigate site constraints and viability issues and to allow a brown field site of this nature an opportunity to present site-specific viability issues and to negotiate with the planning authority on critical matters of infrastructure and services and contributions.

SEPA (0012)

The requirement for a flood risk assessment for the development should be included.

Gorgie Road East Development Principle criterion (J) should be reworded to avoid confusion between fluvial (from the river) and surface water flooding.

A strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

Living Streets Edinburgh Group (0486)

Gorgie Road East Development Principle criterion (e) should be reinforced by clarifying circumstances for very limited car parking and should ensure contributions towards pedestrian infrastructure is received.

Inverdunning (Hatton Mains) Ltd (0427)

On map 29, references H71, H77 and H78 should be replaced with "Place 25". No further modification specified but it is indicated that of the 95 sites allocated for housing, 54 sites are potential windfall only with no commitment to housing. Indeed, in response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. As such, the identified sites should be removed from specific references.

**H78: Stevenson Road (A) Place 26**

Gym Juniors (0762)

No modification specified but it is indicated that any redevelopment of this area should include the provision of this type of amenity to the local community, as part of any plans.

Cordatus Property LP (0533)

Part 4, table 2 (H78) the number of units should be amended from 290 to 350.

The description for part 4, table 2 (H78) should be amended to state "A density range of 125 to 200 units per hectare should be achieved"

The H78 (Stevenson Road((A) Development Principles should be amended as follows:

- The site is surrounded by existing residential development which predominantly ranges from 4 to 6 storeys, also containing the 8 storey Westfield Court and limited 2 storey housing (458-466 Gorgie Road)

Inverdunning (Hatton Mains) Ltd (0427) Simon Thomson (0248)

Delete H78 from the plan.

SEPA (0012)

No modification specified but it is indicated that a strategic FRA for the Water of Leith has been commissioned by CEC and the study includes this reach. The model should be requested from the council and used in conjunction with the Developer Pack to identify whether more site-specific detail is required. Site will likely be heavily constrained due to flood risk and the council may wish to remove the allocation. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to this site. This should be investigated further.

Living Streets Edinburgh Group (0486)

Stevenson Road (A) Development Principle criterion (e) should be reinforced by clarifying circumstances for very limited car parking and should ensure contributions towards pedestrian infrastructure is received.

Mark Ockendon (0419)

Remove Place 26, Stevenson Road (A) Development Principle criterion (e) Replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

**H79: Broomhouse Terrace, Place 27**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

No modification specified but it is indicated that criterion (b) of the Broomhouse Terrace Development Principles "Create a record of any heritage asset identified for demolition."

applies in many circumstances. It is also unclear if the creation of a record is intended to offer any protection to that heritage asset, or to facilitate its demolition.

Criterion (d) of the Broomhouse Terrace Development Principles refers to the creation of a mobility hub which should incorporate a bike/e-bike cycle hire point and car-share opportunities. These should apply to all hubs.

#### Living Streets Edinburgh Group (0486)

Broomhouse Terrace Development Principle criterion (g) should be reinforced by clarifying circumstances for very limited car parking and should ensure contributions towards pedestrian infrastructure is received.

#### SEPA (0012)

No modification specified but it is indicated that the strategic flood risk assessment indicated this would be the location for a strategic SUDS feature on-site but there is no information on such a proposal for Place 27.

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further.

#### Mark Ockendon (0419)

Remove Place 27, criterion (g) Replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

### **H80: Murrayburn Road, Place 28**

#### Living Streets Edinburgh Group (0486)

Murrayburn Road Development Principle criterion (f) should be reinforced by clarifying circumstances for very limited car parking and should ensure contributions towards pedestrian infrastructure is received.

#### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

A map should be provided for each place, including place 28.

Criterion I of Murrayburn Road Development Principles should clarify what is intended by "grlnf" in, "Locate and design new greenspace and green-blue infrastructure to link to existing grlnf networks and natural habitats."

Criterion L of Murrayburn Road Development Principles. appears incomplete, "Investigate Murray Burn culvert location/condition/capacity to see how/if development should account for this and incorporate it into the layout it as an opportunity" The Council should advise on the suitability of the proposal.

#### Archie Clark (0003)

A map should be provided for each place, including place 28.

Criterion I of Murrayburn Road Development Principles should clarify what is intended by “grlnf” in, “Locate and design new greenspace and green-blue infrastructure to link to existing grlnf networks and natural habitats.”

Criterion L of Murrayburn Road Development Principles appears incomplete, “Investigate Murray Burn culvert location/condition/capacity to see how/if development should account for this and incorporate it into the layout it as an opportunity” The Council should advise on the suitability of the proposal.

Criterion F of Murrayburn Road Development Principles will lead to unnecessary congestion. Some off street parking should be encouraged.

Wester Hailes Land and Property Development Company (0064)

No modification specified but it is indicated that a part of H80, of which Wester Hailes Land and Property Development Company are tenants, should be removed from the plan.

Inverdunning (Hatton Mains) Ltd (0427)

No modification specified but it is indicated that unit numbers on H80 should be reduced as the size of H80 should be reduced to Council-owned land only.

Map 29 – reduce size of H80 to Council-owned land, add “Place 28” reference.

SEPA (0012)

No modification specified but it is indicated that Criterion K and L of Murrayburn Road Development Principles need to be clarified. One suggests mitigation, which is difficult to achieve without a good understanding of the risk, and the other is requesting investigation into the location/condition/capacity of the Murray Burn culvert to inform layout. This policy needs to be recast with a strategic and holistic approach to take account of the challenges and opportunities of the site.

There is limited information available on the location and flood risk associated with the Murray Burn and the site may be heavily constrained due to flood risk and the council may wish to remove this allocation.

Due to the large number of allocations along the Murray Burn we would recommend the council take a holistic approach and determine the flood risk from this source to inform suitable development types and locations. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

Mark Ockendon (0419)

Remove Place 28, criterion (f) Replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."



### **H81: Drumbryden Drive, Place 29**

#### Wester Hailes Land and Property Development Company (0064)

No modification specified but it is indicated that H81, of which Wester Hailes Land and Property Development Company are tenants, should be removed from the plan.

#### Inverdunning (Hatton Mains) Ltd (0427)

Replace H81 reference on map 29 with "Place 29"

#### Simon Thomson (0248)

Remove H81 from the plan.

#### SEPA (0012)

No modification specified but it is indicated that the review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

#### Living Streets Edinburgh Group (0486)

Dumbryden Drive Development Principle criterion (f) should be reinforced by clarifying circumstances for very limited car parking and should ensure contributions towards pedestrian infrastructure is received.

#### Mark Ockendon (0419)

Remove Place 29, criterion (f) Replace with "Demonstrate integrated transport options, and support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

### **H82: Murrayburn Gate**

#### SEPA (0012)

No modification specified but it is indicated that a review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

### **H84: Calder Estate**

#### SEPA (0012)

No modification specified but it is indicated that there is limited information available on the location and flood risk associated with the Murray Burn and the site may be constrained due to flood risk. Due to the large number of allocations along the Murray Burn we would recommend the council take a holistic approach and determine the flood risk from this source to inform suitable development types and locations. The draft SFRA mentioned

connecting to the watercourse by building blue/green corridors however without a good understanding of the Murray Burn, this would not be achievable. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to the site. This should be investigated further.

### **H85: Redford Barracks, place 30**

#### Defence Infrastructure Organisation (0124)

The first sentence of policy H85, paragraph (3.77) should be amended to state:

“The Council, in collaboration with the DIO, will prepare a Place Brief for the site which will establish high level principles to inform future masterplanning and design processes.”

Criterion (a) of the Redford Barracks Development Principles should be amended to include information on the other uses which may be appropriate on the site along-side housing (hotel, care home, housing for the elderly/veterans, small scale retail/commercial, leisure etc.)

Criterion (b) of the Redford Barracks Development Principles should be amended to remove the word ‘all’ from the second sentence:

“A development which respects the heritage of the site. New uses for all listed buildings - and their settings- within and adjacent to the site must be an integral part of future development proposals. Any new buildings should have a positive relationship with existing listed buildings in terms of height.” - While the heritage assets create opportunities in terms of place-making and will act as focal points for new development, they also present significant challenges in terms of viability and re-use.

Criterion (g) of the Redford Barracks Development Principles should be amended to replace the term ‘active frontages’ with ‘natural surveillance’. - The location of active frontages should be decided at master planning stage and it is better for active frontages and other local centre type uses to be positioned at key nodal points in the development, not necessarily around the parade ground, to ensure that such uses are viable and appropriate.

#### Richard Marsh (0165)

No modifications specified but it is indicated that development should be in keeping with historic nature of Colinton village, should not impede views of Arthur’s Seat, that traffic is suitably addressed and that development must be net-zero with the opportunity that existing residents can connect to district energy if there is an opportunity.

#### NatureScot (0528)

Criterion (i) of the Redford Barracks development Principles should be amended to: “Maximisation of the views of the Pentland Hills, Craiglockhart Hill, and landmark buildings informed by landscape and visual impact assessment.”

An additional criterion should be added to the Redford Barracks development Principles which requires: “Use site layout and green-blue infrastructure to strengthen existing green

networks and natural habitats, including links between the Water of Leith corridor to Wester Craiglockhart Hill and the corridor of the

Simon Thomson (0248)

Place 30 should be removed from the plan.

Juniper Green & Baberton Mains Community Council (0306)

Criterion (b) of the Redford Barracks development Principles, "New uses for all listed buildings - and their settings - within and adjacent to the site must be an integral part of future development proposals. Any new buildings should have a positive relationship with existing listed buildings in terms of height." we would add "materials and appearance".

No further modifications are specified but it is indicated that the statement in Criterion (i) of the Redford Barracks development Principles which states "Retention of existing streets which are lined by the stables blocks plus other key routes through the site. The frontages to many of these streets needs to be improved to make them more attractive." needs to be carefully monitored to ensure it meets what should be the primary principle: "A development which respects the heritage of the site."

A map for Place 30, Redford Barracks would be useful.

Archie Clark (0003)

A detailed map of place 30 should be included.

Criterion (b) of the Redford Barracks development Principles, "New uses for all listed buildings - and their settings - within and adjacent to the site must be an integral part of future development proposals. Any new buildings should have a positive relationship with existing listed buildings in terms of height." "materials and appearance should be added".

No further modifications are specified but it is indicated that the statement in Criterion (i) of the Redford Barracks development Principles which states "Retention of existing streets which are lined by the stables blocks plus other key routes through the site. The frontages to many of these streets needs to be improved to make them more attractive." needs to be carefully monitored to ensure it meets what should be the primary principle: "A development which respects the heritage of the site."

Living Streets Edinburgh Group (0486)

No modification specified but it is indicated that pedestrians must have priority throughout and development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

SEPA (0012)

No modification specified but it is indicated that due to the large area identified as potentially vulnerable to surface water flooding, this would require careful consideration to ensure existing property and proposed property and infrastructure are not at increased risk

of flooding. We would note that development may be constrained at this location. Although there may be an opportunity here to reduce surface water flooding to existing areas. As the standard of protection offered by the Braid Burn Flood Protection Scheme is unknown we would recommend an FRA is undertaken to inform development type and layout. The draft SFRA identifies that reported flooding should be considered in an FRA with opportunities for wider surface water interactions and the use of green infrastructure.

There is no reference to sustainable urban drainage systems (SUDS). Multi-functional blue green infrastructure should be employed onsite and connectivity to wider green-blue networks made in line with CEC Sustainable Rainwater Guidance. 'Natural flow paths of water must be identified at the visioning stage and inform design.

#### Inverdunning (Hatton Mains) Ltd (0427)

Place 30 should be removed from the plan.

#### Mark Ockendon (0419)

Add a criterion to the Redford Barracks Development Principles: "Ensure support for low-carbon vehicles by providing electric vehicle charging points for new private housing, and on-street parking."

#### Cockburn Association (0777)

No modification specified but it is indicated that all existing green spaces should be retained and enhanced for public and climate mitigation benefit and all existing trees should be protected as a matter of principle. Large areas of hardstanding should be removed where not required and their return to green space. Substantial levels of new tree planting should form part of any development masterplan.

### **Summary of responses (including reasons) by planning authority:**

#### **HSG31: Curriemuirend. (Place 24)**

##### Hallam Land Management (0615)

The Council's position on the delivery of the strategy is set out in Issue 3: Delivery of the Strategy. The Council's position on suggested additional greenfield sites can be found in Issue 9: Suggested additional greenfield sites. The Council's position in relation to the revised vision for West Edinburgh is set out in detail in issue 39.

The Council considers that the section of the plan covering South West Edinburgh is robust and will ensure the aims of the strategy are delivered. **No modification proposed.**

##### Juniper Green & Barberton Main Community Council (0306), Gordon Miller (0520), Archie Clark (0003)

Paragraph 3.70 of the plan states that this housing site was allocated for development in the Edinburgh Local Development Plan (2016) (CD039). The site has therefore already

been through an examination process and has been allocated for housing. The Council considers its assessment of sites to be consistent and robust.

The plan contains the Curriemuirend Development Principles, which are statutory principles that any future development should accord with. Paragraph 3.71 of the plan also states that the Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. Local Communities and key stakeholders will be consulted through the development of the Place Brief. However, once approved the Place Brief will become non statutory planning guidance. Paragraph 3.71 also makes it clear that proposals for any part of the site in advance of an approved Place Brief will be considered as premature, in line with policy Env 2.

It should further be noted that in October 2022 a Local Place Plan (“LPP”) covering the wider Wester Hailes area was submitted to the Council, in terms of Schedule 19 of the Town and Country Planning (Scotland) Act 1997 and the Town and Country Planning (Local Place Plans) (Scotland) Regulations 2021. The Council is actively considering whether the LPP has been validly made and requires to be registered. The Wester Hailes Community Trust and other local stakeholders prepared the LPP with assistance from the Scottish Government. The LPP proposes removal of the Curriemuirend allocation as set out in the adopted LDP and the Proposed City Plan. In the event the Council validates and registers the LPP, the Reporter may consider it to be an emerging material consideration over the course of the Examination.

Pawel Stankiewicz (0445)

Paragraph 3.70 of the plan states that this housing site was allocated for development in the Edinburgh Local Development Plan (2016) (CD039). The site has therefore already been through an examination process. The Council considers its assessment of sites to be consistent and robust. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The plan contains the Curriemuirend Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements. Paragraph 3.71 of the plan also states that the Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. Local Communities and key stakeholders will be consulted through the development of the Place Brief.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF 4 (CD099) and the aims of the National Transport Strategy 2 (CD110). The Councils position in relation to infrastructure delivery- Transport is set out in detail in the response to issue 30. **No modification proposed.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014)

to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 24 is robust and will ensure the aims of the strategy are delivered. **No modification proposed.**

Anna Durlo (0039)

Paragraph 3.70 of the plan states that this housing site was allocated for development in the Edinburgh Local Development Plan (2016) (CD039). The site has therefore already been through an examination process. The Council considers its assessment of sites to be consistent and robust. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

**H71: Gorgie Park Close**

Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy.

The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### Royal Mail Group Limited (0501)

Whilst the Royal Mail Group may currently need their existing sites for current business requirements, those requirements may change over the life-time of the plan. By identifying this site for potential redevelopment for housing led mixed use development the plan is showing its support for future redevelopment of this site, in line with the principles set out in Appendix D (CD002). There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. (CD055) Appendix 1 to Issue 20 Housing Land Supply sets out notional programming for the site. This anticipates a site start in 2030. The methodology for programming of sites is set out in Issue 20 Assessment of Housing Land Supply. The Agent of Change principle puts the onus on developers of new, noise-sensitive properties to effectively deal with potentially problematic noise. **No modification proposed.**

#### **H72: West Gorgie Park**

##### Chesser Engineering Ltd (0369)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/Industry/Storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### **H73: Gorgie Road (Caledonian Packaging)**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

##### Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Caledonian Packaging Ltd (0635)

The comments are noted. This does not impact upon the suitability of the site to be included within the plan or make the details included within appendix D (CD002) inaccurate. **No modification proposed.**

Frederick Innes (0088)

The concerns are noted. It is unclear whether this area forms part of a private garden space, however, this area forms a small part of the overall site and this concern can be resolved through the development management process should development proposals come forward in the future. **No modification proposed.**

SEPA (0012)

Appendix D (CD002) sets out technical requirements for housing proposals. This notes that a flood risk assessment will be required for this site. The Strategic Flood Risk Assessment (September 2021) carried out for City Plan identifies that the site appears to be surrounded by the low likelihood fluvial flood outline. A flood risk assessment is required to confirm flood extents including access/egress. Surface water flood risk is shown to be adjacent to the site and this risk should be investigated.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process and to consult with SEPA if an FRA is required. It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

**H74: Craiglockhart Avenue.**

Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. (CD055) Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**



Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Denise Hill (0637)

The concerns raised are acknowledged. Table 2 of the plan states that the development should accord with the development principles set out in Appendix D (CD002). It is also noted that any future planning application will be assessed against the relevant policies within the plan in respect to design, protecting amenity, flooding and parking provision. **No modification proposed.**

Richard Parkinson (0422)

The concerns raised are acknowledged. Table 2 of the plan states that the development should accord with the development principles set out in Appendix D (CD002). It is also noted that any future planning application will be assessed against the relevant policies within the plan in respect to, flooding and parking provision. The Roads Authority will assess any future application on this site for housing development. **No modification proposed.**

SEPA (0012)

Appendix D (CD002) sets out technical requirements for housing proposals. This states that a flood risk assessment will not be required for this site. The Strategic Flood Risk Assessment (September 2021) (CD011) carried out for City Plan identifies that the risk of infrastructure failure should be considered at this site due to the close proximity of the Union Canal. Contact should be made with Scottish Canals. Surface water flood risk to be considered as part of the re- development, and any risk mitigated within the design proposals.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance. Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process and to consult with SEPA if an FRA is required. It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

**H75: Lanark Road**

Telereal Trillium (0540)

The Council considers the naming of the site to be appropriate and will help the reader to identify where the site is located along with the Proposals Map (CD006) and interactive

mapping system. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply (CD055) of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

SEPA (0012)

Appendix D (CD002) sets out technical requirements for housing proposals. This states that a flood risk assessment will not be required for this site. The Strategic Flood Risk Assessment (September 2021) (CD011) carried out for City Plan identifies that the risk of infrastructure failure should be considered at this site due to the close proximity of the Union Canal. Contact should be made with Scottish Canals

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process and to consult with SEPA if an FRA is required. It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

**H76: Peatville Gardens**

Isabel Brown (0087)

The concerns raised are acknowledged. Table 2 of the plan states that the development should accord with the development principles set out in Appendix D (CD002). Any future planning application will be assessed against the relevant policies within the plan with respect to protecting amenity.

Planning permission for the demolition of the existing Public House and construction of 10 townhouses and one detached dwellinghouse with associated gardens at 195 Kingsknowe Road North, was granted at Development Management Sub Committee under planning application 18/04268/FUL (CD141). Work has not yet commenced on site, it remains a valid allocation. **No modification proposed.**

Chris Brown (0051)

The concerns raised are acknowledged. Table 2 of the plan states that the development should accord with the development principles set out in Appendix D. It is also noted that any future planning application will be assessed against the relevant policies within the plan in respect to protecting amenity and other material considerations.

Planning permission for the demolition of the existing Public House and construction of 10 townhouses and one detached dwellinghouse with associated gardens at 195 Kingsknowe Road North, was granted at Development Management Sub Committee under planning application 18/04268/FUL (CD141). Work has not yet commenced on site, it remains a valid allocation. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process.

The majority of the site is more than 20 metres away from the canal and there is a row of long established houses between the canal and the site. Appendix D (CD002) sets out technical requirements for housing proposals. This states that a flood risk assessment will not be required for this site. This has been informed by the Strategic Flood Risk Assessment (SFRA) (September 2021) carried out for City Plan (CD011). It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

#### **H77: Gorgie Road (east) Place 25**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 25 is robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### Telereal Trillium (0540)

The Council acknowledges that each brownfield site is unique and can present its own challenges. Development plan policies should be considered by developers in their decisions on land options and acquisition. The planning application process allows for material considerations, including viability, to be considered on a case-by-case basis. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The wording of Place Policy 25 is suitably robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

#### SEPA (0012)

The Strategic Flood Risk Assessment (CD011) carried out for the plan did not identify a risk of fluvial flooding to the site. It did identify a medium risk of pluvial (Surface Water) flooding. As a result Appendix D (CD002) does not state a Flood Risk Assessment will be required. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

The Council considers the wording of criterion (J) of the Gorgie Road East Development Principles to be robust. No modification is proposed, however, should the reporter be so minded then appendix D could be amended to say the site may need an FRA and criterion (J) could be amended to also include reference to potential fluvial flooding to provide more clarity.

#### Living Streets Edinburgh Group (0486)

The plan contains the Gorgie Road East Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF4 (CD099) and the aims of the National Transport Strategy 2 (CD110). The Council's position in relation to infrastructure delivery- Transport is set out in detail in the response to issue 30. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development (CD055). Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. The Council considers that Map 29 rightly highlights the 3 separate proposed sites which are located within close proximity of each other. **No modification proposed.**

#### **H78: Stevenson Road (A) Place 26**

##### Gym Juniors (0762)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/Industry/Storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. **No modification proposed.**

##### Cordatus Property LP (0533)

The capacity has been calculated using the methodology set out in the Choices Housing Study 2020 (CD026). The capacities of sites in general is covered in Issue 20: Assessment of Housing Land Supply. A medium-high level of density was applied to the site in line with the methodology set out in the Choices 2020 Housing Study. This density applies to sites which can support a mixture of building and unit types, have good to medium public transport access and where parking would be generally lower than 100%. The actual capacity will be determined through the design process and planning application process. The development surrounding the site is predominantly 2-5 storeys as accurately described in criterion (d) of the Stevenson Road (A) Development Principles. **No modification proposed.**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development (CD055). Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

##### Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for

business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

#### SEPA (0012)

The Strategic Flood Risk Assessment (September 2021) (CD011) carried for the Plan concluded that the site was developable.

Appendix D (CD002) sets out technical requirements for housing proposals. This makes it clear that a flood risk assessment will be required for this site.

Policy Env 35 addresses flood risk. It makes it clear that planning permission will not be granted for development that would increase a flood risk elsewhere or within the site itself., including by failing to allow for the effect of future climate change or where the layout of development does not adopt the precautionary principle. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The plan contains the Stevenson Road (A) Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF4 (CD099) and the aims of the National Transport Strategy 2 (NTS2) (CD110). The Council's position in relation to infrastructure delivery- Transport is set out in detail in the response to Issue 30. **No modification proposed.**

#### Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by NTS2 (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 26 is robust and will help deliver the aims of the strategy. **No modification proposed.**

#### **H79: Broomhouse Terrace, Place 27**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Criterion (b) of the Broomhouse Terrace Development Principles states that proposals will be expected to create a record of any heritage asset identified for demolition. These are buildings that are not listed. The record would not protect or facilitate the heritage asset. It would only ensure that a permanent record of it was recorded. The requirements of each mobility hub is unique to its own individual location. The requirements of mobility hubs are currently being assessed by the Council's active travel and 20 minute neighbour teams.

**No modification proposed.**

Living Streets Edinburgh Group (0486)

The plan contains the Broomhouse Terrace Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF4 (CD099) and the aims of the National Transport Strategy 2 (CD110). The Councils position in relation to infrastructure delivery- Transport is set out in detail in the response to Issue 30. **No modification proposed.**

SEPA (0012)

Policy Env 35 addresses flood risk. It states that proposals should not discharge surface water into the public sewer system to ensure they do not worsen sewer flooding. In exceptional circumstances, where no other option can be achieved, agreement for discharge into a public sewer must be agreed by Scottish Water and not increase flood risk, including from unsanitary foul waste from combined sewers. Policy Env 36 also states developers should collaborate with Scottish Water and the City of Edinburgh Council to fully explore and, wherever possible, replace existing surface water pipework (both on site and adjacent) by using SuDS onsite instead. The Council considers adding an additional criterion to place 27 in this regard would be unnecessary duplication. **No modification proposed.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 27 is robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

**H80: Murrayburn Road, Place 28**

#### Living Streets Edinburgh Group (0486)

The plan contains the Murrayburn Road Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF4 (CD099) and the aims of the National Transport Strategy 2 (CD110). The Council's position in relation to infrastructure delivery- Transport is set out in detail in the response to Issue 30. **No modification proposed.**

#### Juniper Green & Baberton Mains Community Council (0306)

The Council acknowledges that there is a technical error within criterion I. Instead of grinf, this should state "green". This will be amended as a minor drafting matter.

The Council acknowledges that there is a technical error within criterion L. The sentence should end after the word layout. This will be amended as a minor drafting matter.

The Council considers that the maps provided within the plan are adequate. As paragraph 3.3 of the plan explains the full list of housing proposals within City Plan (CD001) can be found in part 4, table 2 and where relevant, further technical requirements can be found in Appendix D (CD002). **No modifications proposed.**

#### Archie Clark (0003)

The Council acknowledges that there is a technical error within criterion I. Instead of grinf, this should state "green". This will be amended as a minor drafting matter.

The Council acknowledges that there is a technical error within criterion L. The sentence should end after the word layout. This will be amended as a minor drafting matter.

The Council considers that the maps provided within the plan are adequate. As paragraph 3.3 of the plan explains the full list of housing proposals within City Plan (CD001) can be found in part 4, table 2 and where relevant, further technical requirements can be found in Appendix D (CD002). The Council considers the wording of Criterion F to be robust and will help deliver the aims of the strategy. **No modification proposed.**

#### Wester Hailes Land and Property Development Company (0064)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/Industry/Storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy.

Appendix D (CD002) sets out technical requirements for housing proposals. This states that a flood risk assessment will be required for this site.



Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process and to consult with SEPA if an FRA is required. It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. H80 is not referenced on Map 29 but is shown in map 31. The Council considers that map 31 provided within the plan clearly shows the size of H80 and is suitably annotated. As paragraph 3.3 of the plan explains the full list of housing proposals within City Plan (CD001) can be found in part 4, table 2 and where relevant, further technical requirements can be found in Appendix D (CD002). **No modification proposed.**

SEPA (0012)

The Strategic Flood Risk Assessment (September 2021) (CD011) carried for the City Plan concluded that the site was developable only with a holistic flood risk assessment which confirms flood extents and opportunities to reduce flood risk within the area.

Appendix D (CD002) sets out technical requirements for housing proposals. This makes it clear that a flood risk assessment will be required for this site.

Criterion (k) of the Murrayburn Road Development Principles further emphasises that proposals will be expected to prepare a flood mitigation strategy based on a holistic assessment of flood risk to all parts of the site, including risk from the nearby culverted Murray Burn. Criterion (l) states that the Murray Burn culvert should also be investigated.

The Strategic Flood Risk Assessment has already identified and assessed the level of risk within the site to a degree. The plan makes it clear that project level works will be required to assess the site in greater detail in order to ensure that any development complies with policy Env 35.

Policy Env 35 addresses flood risk. It makes it clear that planning permission will not be granted for development that would increase a flood risk elsewhere or within the site itself., including by failing to allow for the effect of future climate change or where the layout of development does not adopt the precautionary principle. It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 28 is robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

#### **H81: Drumbryden Drive, Place 29**

##### Wester Hailes Land and Property Development Company (0064)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/Industry/Storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy.

Policy Env 34 (Pollution and Air, Water and Soil Quality) states that development will not be supported that would be subject to and/or cause a significant adverse impact on health, amenity and the environment (including air/soil and water quality as well as ground stability, erosion and noise) unless any detrimental impacts are adequately addressed by design and layout (or by mitigation if a design/layout solution is not possible) and that these measures are appropriate for the development and context. It is standard practice that Environmental Protection would also be consulted on a development of this scale and they would identify any concerns in relation to ground contamination. It is therefore considered that the policies in the plan are sufficient to address any ground contamination risk. **No modification proposed.**

##### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development (CD055). Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan.

H81 is not referenced on Map 29 but is shown in map 31. The Council considers that map 31 provided within the plan is suitably annotated. As paragraph 3.3 of the plan explains the full list of housing proposals within City Plan can be found in part 4, table 2 and where relevant, further technical requirements can be found in Appendix D (CD002). **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The plan contains the Dumbryden Drive Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF4 (CD099) and the aims of the National Transport Strategy 2 (CD110). The Council's position in relation to infrastructure delivery- Transport is set out in detail in the response to Issue 30. **No modification proposed.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 29 is robust and will ensure that the aims of the strategy are delivered. **No modification proposed.**

**H82: Murrayburn Gate**

SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed.**

#### **H84: Calder Estate**

##### SEPA (0012)

The Strategic Flood Risk Assessment (September 2021) (CD011) carried out for the City Plan concluded that the site could be recommended for inclusion. It stated that the site is located adjacent to the Murrayburn. SEPA request that a holistic approach to flood risk in this area is undertaken to understand the flood risk from the Murrayburn.

Table 2 of the plan establishes that development within the site should accord with the Development Principles set out in Appendix D (CD002).

Appendix D sets out technical requirements for housing proposals. This makes it clear that a flood risk assessment will be required for this site.

Policy Env 35 addresses flood risk. It makes it clear that planning permission will not be granted for development that would increase a flood risk elsewhere or within the site itself., including by failing to allow for the effect of future climate change or where the layout of development does not adopt the precautionary principle. It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

#### **H85: Redford Barracks, place 30**

##### Defence Infrastructure Organisation (0124)

Paragraph 3.77 of the plan states that the Council shall prepare a Place Brief for the site. It also states that local communities and key stakeholders will be consulted through the development of the Place Brief. The DIO is a key stakeholder and will be fully consulted through the development of the Place Brief.

Criterion (a) of the Redford Barracks Development Principles states that the requirements in principle will be for a housing led mixed use development. Further details of what these mixed uses will be will come forward during the required masterplan process and at project level.

The Council considers that the wording of criterion (b) and (g) of the Redford Barracks Development Principles is suitably robust and will help the plan achieve its aims. Any breach in the criteria would have to be justified at the planning application stage. **No modification proposed.**

##### Richard Marsh (0165)

Criterion (b) of the Redford Barracks Development Principles states that the requirements in principle will be for a development which respects the heritage of the site. New uses for

all listed buildings, and their settings within and adjacent to the site must be an integral part of future development proposals. Any new buildings should have a positive relationship with existing listed buildings in terms of height.

Criterion (i) of the Redford Barracks Development Principles states that the requirements in principle will be for maximisation of the views of the Pentland Hills, Craiglockhart Hill and landmark buildings. Any future planning application at the site will be assessed against the environment and design and infrastructure and transport policies contained within the plan. **No modification proposed.**

NatureScot (0528)

The Council considers that Criterion (i) of the Redford Barracks Development Principles is suitably robust. As paragraph 3.77 of the plan states the Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. Future master planning and design processes will be informed by landscape and visual impact assessments given the requirements of development principle (i).

The Council considers that there is no requirement for an additional criterion within the Redford Barracks Development Principles. As paragraph 3.77 of the plan states the Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. Any future planning application at the site will be assessed against the environment and design and infrastructure and transport policies contained within the plan. **No modification proposed.**

Simon Thomson (0248)

The Council considers the displacement of businesses is not as significant or extensive as implied in the representation. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306)

The Council considers that the maps provided within the plan are adequate. As paragraph 3.3 of the plan explains the full list of housing proposals within City Plan can be found in part 4, table 2 and where relevant, further technical requirements can be found in Appendix D (CD002). The Council considers the wording of the Redford Barracks Development Criteria to be suitably robust and will ensure the aims of the strategy are met. **No modification proposed.**

Archie Clark (0003)

The Council considers that the maps provided within the plan are adequate. As paragraph 3.3 of the plan explains the full list of housing proposals within City Plan can be found in

part 4, table 2 and where relevant, further technical requirements can be found in Appendix D (CD002). The Council considers the wording of the Redford Barracks Development Criteria to be suitably robust and will ensure the aims of the strategy are met. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The plan contains the Redford Barracks Development Principles, which are statutory principles that any future development should accord with. Several of these principles relate to active and public transport requirements.

Any future planning application will also have to comply with the relevant infrastructure and transport policies as set out in the plan, which reflect SPP (CD096), draft NPF4 (CD099) and the aims of the National Transport Strategy 2 (CD110). The Council's position in relation to infrastructure delivery - Transport is set out in detail in the response to Issue 30. **No modification proposed.**

#### SEPA (0012)

The Strategic Flood Risk Assessment (September 2021) (CD011) carried for the Plan concluded that the site could be recommended for inclusion. It states that 40% of the site is within the low likelihood event, 0% within the Medium likelihood event. The flood risk assessment should confirm the risk and opportunities within the site to provide blue corridors and aim reducing flood risk from all sources with particular focus on surface water flooding.

Appendix D (CD002) sets out technical requirements for housing proposals. This makes it clear that a flood risk assessment will be required for this site.

Criterion (o) of the Redford Barracks Development Principles also states that a flood risk assessment is required and should inform the development and design/layout of the site, including opportunities to address surface water flooding and historic interactions between the Braid Burn and Water of Leith.

Paragraph 3.77 of the plan states the Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. Any future planning application at the site will be assessed against the environment and design and infrastructure and transport policies contained within the plan.

Policy Env 35 addresses flood risk. It makes it clear that planning permission will not be granted for development that would increase a flood risk elsewhere or within the site itself, including by failing to allow for the effect of future climate change or where the layout of development does not adopt the precautionary principle. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Surface Water Management Plan Guidance (CD077).

It is therefore considered that the policies in the plan are sufficient to address any flooding risk. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council's position in relation to the spatial strategy is set out in detail in the response to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable in the period of the plan. **No modification proposed.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153).

The Council considers that the current wording of Place Policy 30 is robust and will help deliver the aims of the strategy. **No modification proposed.**

Cockburn Association (0777)

Paragraph 3.77 of the plan states that the Council shall prepare a Place Brief for the site. The place brief will establish high level principles to inform future master planning and design processes. Any future planning application at the site will also be assessed against the environment and design policies contained within the plan. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 8	Proposed Sites South East Edinburgh	
Development plan reference:	Part 3: Policies - pages 93-100 and Part 4 Table 2 pages 164-165	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Akira Smallwood (0808)</div><div>Alba Developments (0718)</div><div>Amy Pickering (0057)</div><div>Anna Francesca Schiraldi (0416)</div><div>BDW Trading (0350)</div><div>Bethany Cockburn (0036)</div><div>Bill Cook (0730)</div><div>Bo Adams (0363)</div><div>Bruno Longmore (0455)</div><div>CALA Management Ltd (0465)</div><div>Carlo Miccolis (0100)</div><div>Catherine Longmore (0508)</div><div>Clare Fallas (0377)</div><div>Coral MacRury (0085)</div><div>Dandara East Scotland (0757)</div><div>David Lewendon (0699)</div><div>Dimitar Nikolov (0616)</div><div>Edinburgh BioQuarter Partners (0478)</div><div>Edith Watt (0097)</div><div>Francesca Migliorini (0502)</div><div>Gilmerton &amp; Inch Community Council (0716)</div><div>Grange/Prestonfield Community Council (0192)</div><div>Hallam Land Management (0599)</div><div>Hallam Land Management (0615)</div><div>Inverdunning (Hatton Mains) Ltd (0427)</div><div>Iain Watt (0295)</div><div>Irene McQueenie (0045)</div><div>James McKenna (0376)</div><div>James Thin (0141)</div><div>Jennifer Mernlees (0798)</div><div>Jim Henry (0096)</div><div>Liberton &amp; District Community Council (0084)</div></div><div><div>Linda Stark (0670)</div><div>Living Streets Edinburgh Group (0486)</div><div>Miller Homes Limited (0649)</div><div>Moredun Multis And Maisonettes Residents Association (0661)</div><div>Murray Estates (0197)</div><div>Nedelina Nikolov (0048)</div><div>Newcraighall Heritage and Residents Association (0759)</div><div>Newcraighall LLP (0466)</div><div>Paulina Fornal (0166)</div><div>Pawel Stankiewicz (0445)</div><div>Persimmon Homes (0495)</div><div>Rachel Lambe (0374)</div><div>Richard Cook (0710)</div><div>Robertson Residential Group Limited (0490)</div><div>Robyn Kane (0091)</div><div>Samantha Cameron (0240)</div><div>Sandra Mills (0132)</div><div>Scott Cockburn (0034)</div><div>SEEDCo (0198)</div><div>SEPA (0012)</div><div>Simon Thomson (0248)</div><div>Stewart Milne Homes (0118)</div><div>Suzanne Baxter (0237)</div><div>Taylor Wimpey (0200)</div><div>The Association for the Protection of Rural Scotland (0334)</div><div>Tiger Developments Ltd (0602)</div><div>University of Edinburgh (0464)</div></div></div>		
Provision of the development plan to which the issue relates:	Housing sites allocated in Part 4 Table 2 to deliver the housing requirement in the period of the Plan.	
Planning authority's summary of the representation(s):		



## **HSG 17: Greendykes**

### SEPA (0012)

A flood risk assessment (FRA) is required to assess risk from the Niddrie Burn. This reach is part of the Niddrie Burn NFM study and should complement any Pentlands to Portobello environmental improvements projects. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

## **HSG 18: New Greendykes**

### SEPA (0012)

A flood risk assessment (FRA) is required to assess risk from the Niddrie Burn. This reach is part of the Niddrie Burn NFM study and should complement any Pentlands to Portobello environmental improvements projects. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

## **HSG 27: Newcraighall East**

### Newcraighall LLP (0466)

Supports the proposed carrying forward of the existing housing allocation at Newcraighall East (HSG 27) as a housing allocation but object to the number of units specified for the site as 154 units which is apparently based on the remaining homes to be built calculated from 2021 Housing Land Audit. Supports the continued allocation of current Local Development Plan sites with specific reference to Newcraighall East (HSG37) for up to 385 units.

Object to taking forward the approach of seeking developer contributions to healthcare infrastructure. The Infrastructure and Transport Policy Inf 3 Infrastructure Delivery and Developer Contributions should be amended by deleting 'c. primary healthcare infrastructure capacity – proposals to provide floorspace for the provision of new facilities or to extend existing facilities.'

Object to the specific reference in Place 32 Newcraighall stating that Newcraighall East is to, 'h. Provide or contribute towards education, and healthcare infrastructure and community facilities.' Healthcare infrastructure (such as GP services) is currently not an issue (either legally or financially) that can be addressed by the planning system. Any developer contributions must be imposed according to the tests set out in the relevant Scottish Government Circular.

Object to the Map 32 Newcraighall/Brunstane layout making provision for an extension of Newcraighall Primary School's grounds. Although this parcel of land was designated as being required for the extension of Newcraighall Primary School under the Section 75 Agreement for the previous development (10/03506/PPP) - and was due to be conveyed to the City of Edinburgh Council, the Council has confirmed that they now no longer require this land. Seek the amendment of the notation from Map 32 to remove reference to 'School grounds extension at Newcraighall'. Seeks the addition of this parcel of land for housing as part of HSG 27 Newcraighall East allocation.

Seeks the amendment of the green corridor notation on Map 32 for HSG 27 site by reducing its width. There has been discussion with Scottish Power Network (SPN) and this has determined that the stand-off area around the pylons will be less than the area identified on Map 32 for the green corridor. The rights for services and access have also been retained through the neighbouring Avant site demonstrating that development has been contemplated.

Living Streets Edinburgh Group (0486)

No objection to site in principle, but there is reference to active travel, and not to pedestrian priority. Development should be no different from others, regardless of its location. Pedestrians must have priority throughout with development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

Newcraighall Heritage and Residents Association (0759)

Reference to road link to Newcraighall should make clear that the road junctions at the A1 and around Fort Kinnaird will also need upgrading to cope with the increase in use.

**HSG 29 Brunstane**

Dandara East Scotland (0757)

Dandara supports the continued allocation of HSG29 Brunstane and is committed to delivering houses at the site in this plan period.

SEPA (0012)

A flood risk assessment has been requested for Place 33 and we support this. This reach is part of the Niddrie Burn flood management study and should complement any Pentlands to Portobello environmental improvements projects. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

Living Streets Edinburgh Group (0486)

No objection to site in principle, but there is reference to active travel, and not to pedestrian priority. Development should be no different from others, regardless of its location. Pedestrians must have priority throughout with development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

**HSG 30: Moredunvale Road**

Moredun multis and maisonettes residents association (0661), Clare Fallas (0377), Linda stark (0670), Nedelina Nikolov (0048), Richard Cook (0710), Jennifer Mernlees (0798), Rachel Lambe, Paulina Fornal (0166), Carlo Miccolis (0100), Akira Smallwood (0808), Robyn Kane (0091), Anna Francesca Schiraldi (0416)

The site includes vital green space. This space is used as by local residents for community use (as garden, a place to hold events, a safe space to walk dogs and for children to play.)

Bill Cook (0730)

The proposal to zone this community green space should be removed in its entirety. Not consistent with other parts of the plan:

- Introduction - City Plan 2030 recognises our city's "beautiful green environment"
- Introduction - notes the "poverty and health inequalities in our communities"
- Introduction - claims "we want our city to lead the way in responding to ..... the social inequalities felt by our residents"
- Introduction - about ensuring the residents "have a good place to live"
- Introduction - declares that the plan "protects places of value"
- Strategy Aim No.5 - instructs implementing environment policies to ".... protect our beautiful green setting .....physical and mental well-being"

Moredun Multis And Maisonettes Residents Association (0661)

Site should be removed as a proposal as it is a greenfield site – not brownfield

Carlo Miccolis (0100)

Should be considered for regeneration providing improved community facilities.

Dimitar Nikolov (0616)

Objects to building Council houses as High-rise

Paulina Fornal (0166)

Development will lead to increased traffic and congestion

Robyn Kane (0091)

Insufficient facilities in the area for increasing population (GPs, Schools, buses, chemists)

SEPA (0012)

A flood risk assessment has been requested, and we support this. This reach is part of the Niddrie Burn NFM study and should complement any Pentlands to Portobello environmental improvement projects. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

Living Streets Edinburgh Group (0486)

No objection to site in principle, but there is reference to active travel, and not to pedestrian priority. Development should be no different from others, regardless of its location. Pedestrians must have priority throughout with development designed

accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

#### **HSG 40: Edmonstone**

##### SEPA (0012)

Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site.

As this land lies over former mines and has a relatively high water table, we support the requirement to “ensure appropriate grouting and mine entry treatment works are carried out prior to commencement of development” in order to protect ground water. We would also advise careful pre-application discussions on water management at this site.

##### The Association for the Protection of Rural Scotland (0334)

Paragraph 3.85. APRS much regrets the removal of this important countryside from the greenbelt in the ELDP of 2016. A clarification of its present/new status is required e.g. is it now classified as Countryside.

##### Pawel Stankiewicz (0445)

At Place 36 add a paragraph to state that woodland on the west side will be preserved and enhanced and The Wisp/Old Dalkeith Road junction will be widened.

##### Living Streets Edinburgh Group (0486)

No objection to site in principle, but there is reference to active travel, and not to pedestrian priority. Development should be no different from others, regardless of its location. Pedestrians must have priority throughout with development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

#### **H86: BioQuarter**

##### Edinburgh BioQuarter Partners (0478)

Object to BioQuarter being referred to as an ‘Employment Centre’ on Spatial Strategy Map. Vision is “to rapidly grow the site into a new vibrant neighbourhood of Edinburgh centred around a world-leading community of healthcare innovators. By developing at scale and pace we will accelerate solutions to global health challenges.” - To transition BioQuarter from a science park with pavilions and green landscape to a high density, urbanised new neighbourhood.

The Edinburgh BioQuarter will be an exemplar development encompassing many, if not all, of the Aims as articulated at paragraph 2.2 of the Proposed City Plan. A place-based approach has been adopted in the preparation of the masterplan and will involve the creation of high quality, high density, mixed use, walkable communities.

Welcome the use of place based policies.

Following MIR, the EBQ partners submitted text and accompanying diagrams which were considered to be appropriate for the relevant BioQuarter policy and this post-Choices document has been incorporated in a revised form to accommodate the place-based policies approach.

Consider that the allocation of BioQuarter should be included within an appropriate allocation to allow mixed use place-making at the BioQuarter to be delivered.

Consider the BioQuarter should be defined as one of the Major New Development Areas on Map 1.

The wording of Place 31 Policy should be amended. EBQ Partners prepared two diagrams (in post choices document and attached to rep) to support the detailed wording of the suggested allocation which should be included in Place 31. In addition, various amendments to the development principles are proposed.

BDW Trading (0350), Murray Estates (0197), SEEDCo (0198), Taylor Wimpey (0200), Persimmon Homes (0495), Robertson Residential Group Limited (0490)

Object to aim 10 – ‘delivering key economic land use needs through housing led mixed use development’ – specifically reallocation of strategic business land at BioQuarter to housing.

BDW Trading (0350), Murray Estates (0197), SEEDCo (0198), Taylor Wimpey (0200), Persimmon Homes (0495), Robertson Residential Group Limited (0490), CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), SEEDCo (0198), Hallam Land Management (0615)

The approach to reallocating strategic business land to housing was not consulted upon at MIR stage.

Robertson Residential Group Limited (0490), SEEDCo (0198), Taylor Wimpey (0200), Murray Estates (0197), BDW Trading (0350), Stewart Milne Homes (0118), Persimmon Homes (0495)

Re-allocating approximately 400 active businesses and strategic employment sites (including land at BioQuarter) for housing will not deliver the outcome ‘A city where everyone shares in its economic success’.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The BioQuarter - Outline Business Case was approved by Council prior to publication of proposed plan and identifies 400 new residential housing units and 200 affordable housing to be delivered between 2032 and 2037 - significantly less than that set out in the Proposed plan - 2,500 by 2032.

Inverdunning (Hatton Mains) Ltd (0427)

Amend Development Principles, 2nd para. "A mix of uses focused around the BioQuarter's role as a life sciences quarter, including around 2500 residential units (1,000 within City Plan 2030 period), community facilities, commercial and leisure to encourage evening and weekend activity." - capacity reference for the Edinburgh BioQuarter site requires to be reduced in terms of deliverability within the plan period.

Hallam Land Management (0615)

Object to the dilution and removal of employment land in this location and the introduction of 2500 residential uses. Object to the Development Principles associated with facilitating this development.

It is not a sustainable location and should not be considered in advance of appropriate greenfield allocations. The impact of this development cannot be satisfactorily accommodated and is essentially greenfield land in any case.

Gilmerton & Inch Community Council (0716)

Due to lack of local infrastructure, the location of the land makes development for housing difficult.

Simon Thomson (0248)

Capacity should be reduced – loss of employment land too great

Bo Adams (0363)

Environmental Proposal BGN51 – Play facilities and open space at BioQuarter is not bold enough. Should set standards and each new development should include such things as skate park, basketball court, table tennis etc. South of Edinburgh has no investment.

SEPA (0012)

A flood risk assessment (FRA) is requested for this Place, and we support this. The FRA should include consideration of capacity in the strategic SUDS already in place on the site of the Edinburgh BioQuarter. We support the inclusion of BGN46 and BGN51 as important elements of development of this Place.

The FRA should assess the risk from the Niddrie Burn and incorporates the works that have been done as part of the diversion channel and Magdalene Burn.

The Association for the Protection of Rural Scotland (0334)

Some of the emerging new buildings, in geometric forms, appear to uncomfortably dominate their immediate surrounding. Is the scale and height of these buildings excessive Can these uncomfortable effects be mitigated

Living Streets Edinburgh Group (0486)

No objection to site in principle, but there is reference to active travel, and not to pedestrian priority. Development should be no different from others, regardless of its location and mixed use status. It is well served by public transport and pedestrians must have priority throughout with development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

University of Edinburgh (0464)

It is recognised that the BioQuarter has been given specific recognition through Policy Place 31: BioQuarter, however, the policy wording or supporting text does not make any specific reference to university activity being a key component of this area. The University already have a number of established and high profile facilities at the BioQuarter as noted in section 2.2 and are an active participant and key stakeholder in the future aspirations to further develop the location. This should be reflected with explicit reference to the importance of university participation as a key partner in the further development of the BioQuarter.

**H87: Duddingston Park South**

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with the owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

A flood risk assessment (FRA) is requested in Proposed Plan Appendix D, and SEPA supports this request.

An FRA is needed which assesses the risk from the Niddrie/Brunstane Burn. Consideration should be given to any culverts/bridges might may exacerbate flood risk. As there is an increase in land-use vulnerability the site may be constrained due to flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to this site.

**H88 Moredun Park Loan**

Linda Stark (0670)

Local services (Schools, GPs, Chemists) already strained by a lot of other new build in the area. Resource should go towards improving existing stock

Proposal would be over-looked by neighbouring high rises.

Iain Watt (0295), Edith Watt (0097), Scott Cockburn (0034), Bethany Cockburn (0036), David Lewendon (0699), Irene McQueenie (0045), Sandra Mills (0132), Sandra Mills (0132)

Proposal is a car park that is required by local residents. Loss will lead to increased traffic and congestion.

### **H89 Moredun Park View**

Linda stark (0670)

Local services (Schools, GPs, Chemists) already strained by a lot of other new build in the area. Resource should go towards improving existing stock.

Proposal would be over-looked by neighbouring high rises

Jennifer Mernlees (0798), Gilmerton & Inch Community Council (0716)

The site is a community centre that is used daily by local residents. The community centre is required and should be retained.

### **H90: Morrisons at Gilmerton Road**

Gilmerton & Inch Community Council (0716)

Development of the site will lead to increased congestion in the area if not planned carefully. Site would be better used as a medical centre.

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

### **H91: Liberton Hospital/Ellen's Glen Road**

Samantha Cameron (0240)

Development of the site will lead to increased flooding in Ellen's Glen.



Bruno Longmore (0455)

Ellen's Glen area is considered to be an area of significant interest both in terms of the historic residences and the natural woodland.

Ellen's Glen road is insufficiently wide to support any increase in traffic particularly marked at key bottlenecks - any increase in traffic use would endanger cyclists and be detrimental to local flora/fauna. Re-opening a residential road to large numbers of vehicles is contrary to Edinburgh Council's policy of reducing vehicle use within the city.

Liberton & District Community Council (0084)

Supports the development, but considers that the only vehicular access should be from Lasswade Road. The accesses shown in the Proposed Plan to Malbet Wynd and Ellen's Glen Road are considered unsuitable for vehicular traffic. Ellen's Glen Road could be closed over a considerable length as part of an active travel route. The access shown to Malbet Wynd is to an internal estate road which was not intended for through traffic. Ellen's Glen Road is extremely narrow and constrained by stone walls and embankments.

- Request the reference to vehicular access to Malbet Wynd and Ellen's Glen Road changed to Active Travel access only in sub section (c) of the Design Principles.

Would also like clarification of sub section (f) of the Design Principles.

Request change to sub-section (f ) of the Design Principles is to clarify what is meant by the reference to "retention or re-use of Liberton Hospital within any new development". This statement has led some residents to interpret this as referring to health facilities.

LDCC considers that it is essential that it is involved in the early stages of Master Planning and the development of Design Principles

SEPA (0012)

A flood risk assessment is required and consideration is to be given to flood storage. We support this and we support the inclusion of BGN34 as part of a city-wide strategic approach to avoiding flood risk and water management.

An FRA which assesses the risk from the Stenhouse Burn along the boundary of the site and may be partially culverted. Consideration should be given to any culverts/bridges which might exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further.

James McKenna (0376)

Proposed density of development is too high – would be cramped for residents and cause loss of amenity for neighbouring residents.

Suzanne Baxter (0237)

The site of Liberton Hospital and the land surrounding is a wildlife haven.

Access is to be from Malbet Park which is already a busy thoroughfare, especially for children walking to Liberton High School.

The roads within the development cannot support further traffic.

James McKenna (0376)

Access through Malbet Wynd and Malbet Park not necessary. Would result in rat run. Access from Malbet Wynd and Malbet Park should be restricted to pedestrians and cycles.

Suzanne Baxter (0237), James McKenna (0376)

Insufficient local infrastructure (GPs, schools) to support proposed additional homes

Suzanne Baxter (0237)

Insufficient public transport to support additional housing. Roads are in poor repair and cannot cope with current volume of traffic, so how will it cope with additional homes.

Amy Pickering (0057)

Access through Malbet Wynd is not necessary. Increased vehicle traffic through Malbet Wynd would cause unnecessary frustration for current residents and decrease the attractiveness of the greenspaces present in the existing residential area.

Coral MacRury (0085)

Considers it would be a great pity to give all of this area over to housing.

Jim Henry (0096)

Brownfield part of site should be redeveloped. Undeveloped field should be considered for use as open space for recreational use. Access to Lasswade Road via Ellen's Glen Road and Malbet Park should be deleted. Proposed access to Ellen's Glen Road as shown on Map 33 is impractical, however, could be resolved by relocating the access to the south which is unimpeded by ground collapse.

Considers that Ellen's Glen Road is too narrow and unsuitably aligned to cope with levels of traffic from Lasswade Road via Ellen's Glen Road. Suggests that vehicular traffic should be one way from Lasswade Road to a revised access and that any traffic from the site into Malbet Park Estate should be restricted to that heading towards Lasswade Road.

Concerned that if the access as proposed on Map 33 is retained it would necessitate the re-opening of the section of Ellen's Glen Road between the proposed access and Gilmerton Road as consider this is suitable for additional traffic.

James Thin (0141), Francesca Migliorini (0502), Catherine Longmore (0508)

There should be no access from Ellen's Glen Road. All access should be direct from Lasswade Road. Ellen's Glen Road is a green active travel corridor and not suitable for through car traffic. Bollards should be kept in the same location.

Living Streets Edinburgh Group (0486)

No objection to site in principle, but there is reference to active travel, and not to pedestrian priority. Development should be no different from others, regardless of its location. Pedestrians must have priority throughout with development designed accordingly, likewise car parking must be limited and contributions secured to enhance public transport and surrounding pedestrian infrastructure.

**H92: Gilmerton Dykes Street**

Gilmerton & Inch Community Council (0716)

Areas is already dangerous from traffic. New housing will increase potential for accidents.

**H94: Old Dalkeith Road**

Tiger Developments Ltd (0602)

Supports site allocation for alternative use but other uses such as student housing should also be considered.

Gilmerton & Inch Community Council (0716)

Site is on 'Blue Light' Route. Additional housing could cause delays to ambulances (already problem though the places for people additions).

Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

SEPA (0012)

A flood risk assessment (FRA) is requested in Proposed Plan Appendix D, and SEPA agrees this is necessary.

There is uncertainty regarding the Braid Burn Flood Protection Scheme and its interaction with the Pow Burn. An FRA is required which assesses both the Braid Burn and the Pow Burn. Consideration should be given to any culverts/bridges which might exacerbate flood risk. As this area is identified for numerous development plots we would recommend the

council considers a holistic approach and undertake a wider FRA which will inform suitable development locations and land-use types. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within/adjacent to the site. This should be investigated further.

### **H95: Peffermill Road**

#### **Grange/Prestonfield Community Council (0192)**

Planning consent at 64 Peffermill Road is 30 flats so correct number of units should be inserted.

#### Inverdunning (Hatton Mains) Ltd (0427)

Site should be considered as a windfall opportunity rather than a proposal. The Council have not been in touch with owners but an exercise carried out by Pegasus suggests there is opposition to releasing sites from business use. CPO has been indicated as a possible solution but the timescale for this would mean that the sites would not be deliverable in the plan period.

#### Simon Thomson (0248)

Sites not available for housing development as they are currently in business use. A proportion may come forward but the proposed number is not backed up by evidence. Combined result of loss of business businesses would result in lack of jobs or further land needed to relocate businesses.

#### SEPA (0012)

There is uncertainty regarding the Braid Burn Flood Protection Scheme and its interaction with the Pow Burn. An FRA is required which assesses both the Braid Burn and the Pow Burn. Consideration should be given to any culverts/bridges may exacerbate flood risk. As this area is potentially identified for numerous development plots we would recommend the council considers a holistic approach and undertake a wider FRA which will inform suitable development locations and land-use types.

### **Housing Development – non specific**

#### Robyn Kane (0091)

Object to additional housing in the locality as there is already pressure on healthcare services – made worse with closure of Liberton Hospital.

#### Bo Adams (0363)

No plans for development around Frogston Road East - a good place to develop this area into a green example with safe, wide, segregated active infrastructure links and high quality leisure & family infrastructure and good high school with sport facilities. The area needs to be looked at - no cycle lane with new Frogston Primary School - no way of getting to town actively and safely.

## **Modifications sought by those submitting representations:**

### **HSG 17: Greendykes**

#### SEPA (0012)

Modify Plan to require a flood risk assessment for the Niddrie Burn

### **HSG 18: New Greendykes**

#### SEPA (0012)

Modify Plan to require a flood risk assessment for the Niddrie Burn

### **HSG 27: Newcraighall East**

#### Newcraighall LLP (0466)

Modify the Plan as follows;

- Para.3.3 p.41 - section to be added for 'South East Edinburgh' sites to include Place 32 Newcraighall, as well as other sites located in South East Edinburgh (i.e. Places 31 to 36);
- Place 32 Newcraighall p.94 – amend 'Para.3.80 e. ...This greenspace should be fronted by new development add 'on both sides...';
- Place 32 Newcraighall p.94 – delete 'Para.3.80 f. Layout should make provision for an extension of Newcraighall Primary School's grounds' as no longer required.
- Place 32 Newcraighall p.94 – amend 'Para.3.80 h. Provide or contribute towards education [delete – and healthcare infrastructure] and community facilities.';
- Map 32 Newcraighall/Brunstane p.96 – add housing notation to the map;
- Map 32 Newcraighall/Brunstane p.96 – amend notation 'proposed school (2ha) at Brunstane' and delete 'school grounds extension at Newcraighall';
- Map 32 Newcraighall/Brunstane p.96 – delete 'S' notation on land identified for school grounds extension at Newcraighall and add housing notation as part of HSG 27 allocation; and
- Map 32 Newcraighall/Brunstane p.96 – amend by reducing width of green corridor notation at HSG 27.

#### Living Streets Edinburgh Group (0486)

Modification not specified.

#### Newcraighall Heritage and Residents Association (0759)

Reference to road link to Newcraighall should make clear that the road junctions at the A1 and around Fort Kinnaird will also need upgrading to cope with the increase in use.

### **HSG 29: Brunstane**

#### Living Streets Edinburgh Group (0486)

Modification not specified.

### **HSG 30: Moredunvale Road**

Moredun multis and maisonettes residents association (0661), Clare Fallas (0377), Linda Stark (0670), Nedelina Nikolov (0048), Richard Cook (0710), Jennifer Mernlees (0798), Rachel Lambe, Paulina Fornal (0166), Carlo Miccolis (0100), Akira Smallwood (0808), Robyn Kane (0091), Anna Francesca Schiraldi (0416), Bill Cook (0730), Moredun multis and maisonettes residents association (0661)

Modify plan to delete site.

Carlo Miccolis (0100)

Modify plan to identify site for improved community facilities.

Dimitar Nikolov (0616)

Modification not specified but infers removal of site.

Paulina Fornal (0166)

Modification not specified but infers removal of site.

Robyn Kane (0091)

Modification not specified but infers removal of site.

Living Streets Edinburgh Group (0486)

Modification not specified.

### **HSG 40: Edmonstone**

SEPA (0012)

Modification not specified.

The Association for the Protection of Rural Scotland (0334)

Modification not specified.

Pawel Stankiewicz (0445)

At Place 36 add a paragraph to state “woodland on the west side will be preserved and enhanced” and “The Wisp/Old Dalkeith Road junction will be widened”.

Living Streets Edinburgh Group (0486)

Modification not specified.

## **H86: BioQuarter**

### Edinburgh BioQuarter Partners (0478)

Modify reference to BioQuarter on Spatial Strategy Map to define it as a Major New Development Area.

Modify plan to include the BioQuarter within an allocation.

Modify wording of Policy Place 31 as follows;

- Place 31 – Edinburgh BioQuarter: Planning permission will be granted for development within the boundary of Edinburgh BioQuarter as defined on the Proposals Map, provided it accords with the BioQuarter Development Principles (defined below and in Diagrams 1 and 2) and the approved, or subsequently approved, master plan.
- Paragraph 3.79 – A BioQuarter master plan will be prepared to support the future development of the Edinburgh BioQuarter for a development focused on health innovation-led mixed use development. This co-location of uses helps the development and city on its journey toward net-zero.

Modify Policy Place 31 to include the following diagrams;

- Diagram 1 illustrated the Development Principles which were proposed for the allocation and is reflective of the Development Principles (subject to suggested amended wording) included within the Place 31 policy. The Development Principles Diagram 1 would provide greater clarity and certainty in relation to these principles.
- Diagram 2, which confirmed Datum Heights across the proposed BioQuarter and, in particular, restricting those heights within the Sensitive Area, as already defined in the Edinburgh BioQuarter Supplementary Guidance (2013). The EBQ partners are concerned that the absence of the Development Principles and Datum Height diagrams will undermine confidence in the BioQuarter bidding process currently underway, and that these should be included within the City Plan to provide the necessary certainty for all partners in bringing forward BioQuarter over the Plan period. In addition, the wording of Place 31 should be amended to reflect the diagrams.

Modify the Place 31 Development Principles as follows;

- Principle B is largely supported with the following suggested amendments: “a mix of uses focused around the BioQuarter’s role as a life sciences quarter health innovation district, including at least 260,000sqm of health innovation uses, and in the region of 2,500 residential units, community facilities, commercial and leisure to encourage evening and weekend activity” – this more accurately reflects the BioQuarter Place Strategy and ensures that the mixed use development is led by health innovation uses.
- Principle C requires to be amended to reflect the heights considered appropriate in discussion with CEC Landscape. Change to “Development which respects the site’s location within the wider landscape setting of the city – the extent of

development and building heights shall be in accordance with Diagrams 1 and 2, managed to protect the landscape character and the visual connectivity of the Craigmillar and Edmonstone ridges". Any increase in building heights beyond those defined in Diagram 2 will be assessed through a landscape and visual impact assessment accompanying future planning applications.

- Principle F requires transport contributions and should reflect the contributions already made by the EBQ Partners in relation to the initial phases of the development, on foot of PPP 02/04372/OUT, 13/0548/FUL and 19/03063/FUL. Edinburgh BioQuarter paid a tram contribution of £749,192 and a Transportation Study Payment of £50,000, and Principle F should be amended to make reference to transport contributions which are necessary and proportionate, and deduct previous payments made by the BioQuarter Partners for the avoidance of doubt.
- Principles G and H relate to matters which are controlled by policy INF3 (Infrastructure Delivery and Developer Contributions) and the EBQ partners would suggest that this reference should either be made more explicit to the requirements as set out in that policy (and in particular to the requirements of Part 4, Table 11 as they relate to new primary school and healthcare facilities) or the reference should be deleted as it duplicates the requirements of policy INF3. Table 11 includes a requirement relating to Edinburgh BioQuarter at reference ED8, and refers to the need for a new 14-class primary school to serve the BioQuarter and Edmonstone sites in the form of a site of two hectares being required. The Place 31 policy refers to either a contribution or provision towards education, and greater clarity is required either in the Place 31 policy or under ED8 in Table 11 in terms of either the provision of a site or the developer contributions associated with individual residential units. The same comments apply in relation to healthcare facilities – Table 12 (Healthcare Infrastructure) states, "Development at the Edinburgh BioQuarter will require a new practice in this area" and references the fact that development pressure in the area has already resulted in a proposed practice which is unrelated to the BioQuarter proposal. It is important that the need for a new practice is justified specifically in relation to BioQuarter or in relation to wider residential allocations in the southeast area, and the EBQ partners would welcome further clarity on this issue.

BDW Trading (0350), Murray Estates (0197), SEEDCo (0198), Taylor Wimpey (0200), Persimmon Homes (0495), Robertson Residential Group Limited (0490)

Modification not specified but infers removing reference to Edinburgh BioQuarter in Aim 10.

BDW Trading (0350), Murray Estates (0197), SEEDCo (0198), Taylor Wimpey (0200), Persimmon Homes (0495), Robertson Residential Group Limited (0490), CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), SEEDCo (0198), Hallam Land Management (0615)

Modification not specified but infers removing reference to housing on existing allocated business sites.



Robertson Residential Group Limited (0490), SEEDCo (0198), Taylor Wimpey (0200), Murray Estates (0197), BDW Trading (0350), Stewart Milne Homes (0118), Persimmon Homes (0495)

Modification not specified but infers removing reference to housing on existing allocated business sites.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Modification not specified, but infers reducing the number of houses allocated for the Edinburgh BioQuarter to 400.

Inverdunning (Hatton Mains) Ltd (0427)

Modify plan to reduce the number of houses allocated for the Edinburgh BioQuarter to that which can be delivered within the Plan period.

Hallam Land Management (0615)

Modification not specified but infers removing reference to housing on Edinburgh BioQuarter.

Gilmerton & Inch Community Council (0716)

Modification not specified.

Simon Thomson (0248)

Modify plan to reduce the number of houses allocated for the Edinburgh BioQuarter.

Bo Adams (0363)

Modify development principles to set out more detailed open space standards and each new development should include a skate park, basketball court, table tennis etc.

The Association for the Protection of Rural Scotland (0334)

Modification not specified.

Living Streets Edinburgh Group (0486)

Modification not specified.

University of Edinburgh (0464)

Modify Policy Place 31 to make a specific reference to the importance of the university participation as a key partner in the further development of the BioQuarter.

**H87: Duddingston Park South**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Modify Plan to delete site.

### **H88 Moredun Park Loan**

Linda stark (0670), Iain Watt (0295), Edith Watt (0097), Scott Cockburn (0034), Bethany Cockburn (0036), David Lewendon (0699), Irene Mcqueenie (0045), Sandra Mills (0132)

Modification not specified.

### **H89 Moredun Park View**

Linda stark (0670)

Modification not specified.

Jennifer Mernlees (0798), Gilmerton & Inch Community Council (0716)

Modify Plan to retain community centre.

### **H90: Morrisons at Gilmerton Road**

Gilmerton & Inch Community Council (0716)

Modify Plan to allocate site for medical centre.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Modify Plan to delete site.

Simon Thomson (0248) Inverdunning (Hatton Mains) Ltd (0427),

Modify Plan to delete site.

### **H91: Liberton Hospital/Ellen's Glen Road**

Samantha Cameron (0240)

Modification not specified.

Bruno Longmore (0455)

Modification not specified.

Liberton & District Community Council (0084)

Modify the development principles to indicate that the only vehicular access should be from Lasswade Road. Modify the reference to vehicular access to Malbet Wynd and

Ellen's Glen Road changed to Active Travel access only in sub section (c) of the Design Principles.

Modify (f) of the Design Principles is to clarify what is meant by the reference to "retention or re-use of Liberton Hospital within any new development".

James McKenna (0376)

Modification not specified but implies reducing the number of houses allocated on the site.

Suzanne Baxter (0237)

Modification not specified.

James McKenna (0376), Amy Pickering (0057)

Modify development principles to remove reference to access from Malbet Wynd and Malbet Park.

Suzanne Baxter (0237), James McKenna (0376)

Modification not specified.

Coral MacRury (0085)

Modification not specified but implies the site should not be developed entirely for housing.

Jim Henry (0096)

Modify Plan and delete access via Ellen's Glen Road and Malbet Park. Vehicular traffic should be one way from Lasswade Road to a revised access and that any traffic from the site into Malbet Park Estate should be restricted to that heading towards Lasswade Road

Consider undeveloped field for use as open space.

James Thin (0141), Francesca Migliorini (0502), Catherine Longmore (0508)

Delete access via Ellen's Glen Road.

Living Streets Edinburgh Group (0486)

Modification not specified.

## **H92: Gilmerton Dykes Street**

Gilmerton & Inch Community Council (0716)

Modification not specified but implies deleting site.

## **H94: Old Dalkeith Road**

Tiger Developments Ltd (0602)

Modify site allocation to support student housing.

Gilmerton & Inch Community Council (0716)

Modification not specified but implies deleting site.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Modify Plan to delete site.

### **H95: Peffermill Road**

Grange/Prestonfield Community Council (0192)

Change capacity to 30 to reflect planning consent at 64 Peffermill Road.

Inverdunning (Hatton Mains) Ltd (0427), Simon Thomson (0248)

Modify Plan to delete site.

### **Housing Development – non specific**

Robyn Kane (0091)

Modification not specified.

Bo Adams (0363)

Modify Plan to allocate land at Frogston Road East for housing.

### **Summary of responses (including reasons) by planning authority:**

#### **HSG 17: Greendykes**

SEPA (0012)

The site HSG 17 is a legacy housing site carried forward from the adopted LDP, parts of which under construction. Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

#### **HSG 18: New Greendykes**

SEPA (0012)

The site HSG 18 is a long standing legacy housing site carried forward from the adopted LDP that has planning permission, parts of which are under construction. Policy Env 36

requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

### **HSG 27: Newcraighall East**

#### Newcraighall LLP (0466)

The Council welcomes support for this housing allocation. The housing figure (154 units) for the site is based on the remaining number of units to be completed from the 2021 Housing Audit (CD055), which the Council considers was the most up to date source of information at the time the Plan was published. A more recent audit has also been completed and reported to Planning Committee on 2 November 2022 (CD180).

The Council considers that seeking developer contributions towards healthcare infrastructure is justified and the Council sets out its position in detail in its responses in Issue 27: Infrastructure Delivery and Developer Contributions. The Newcraighall site is within a health care contribution zone as shown in the Council's finalised Developer Contributions and Infrastructure Delivery Guidance (CD045), which is a material consideration when assessing planning applications. As a result, the Council does not agree that the reference to healthcare should be removed.

The Council acknowledges the intention to relocate children to a new primary school, however, due to the potential for unforeseen circumstances associated with school rolls the Council considers it prudent to retain the safeguard. The Council sets out in response to this matter in detail in Issue 29: Infrastructure Delivery – Education.

Map 32 is an indicative map and not to scale. As a result, the Council does not consider there is a need to narrow the width of the green corridor shown on the map. In addition, the map is clear that the greenspace is fronted by development on both sides and therefore this is implicit in the text in criterion e. **No modification proposed**

#### Living Streets Edinburgh Group (0486)

Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. Place 31 (g) requires that proposals contribute towards the specified transport infrastructure. This includes enhanced bus provision and active travel routes. Policy Inf 7 encourages private car parking free or low car parking developments. **No modification proposed**

#### Newcraighall Heritage and Residents Association (0759)

Policies in the plan address issues of transport infrastructure. Policy Inf 3 requires that there should be sufficient infrastructure capacity available or that it can be delivered at the appropriate time. Inf 4 addresses impacts and mitigation. It is not necessary to replicate these policies within Place 32. **No modification proposed**

### **HSG29 Brunstane**

### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

### Living Streets Edinburgh Group (0486)

Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. Place 31 (g) requires that proposals contribute towards the specified transport infrastructure. This includes enhanced bus provision and active travel routes. Policy Inf 7 encourages private car parking free or low car parking developments. **No modification proposed**

### **HSG 30: Moredunvale Road**

Moredun multis and maisonettes residents association (0661), Clare Fallas (0377), Linda stark (0670), Nedelina Nikolov (0048), Richard Cook (0710), Jennifer Mernlees (0798), Rachel Lambe, Paulina Fornal (0166), Carlo Miccolis (0100), Akira Smallwood (0808), Robyn Kane (0091), Anna Francesca Schiraldi (0416), Bill Cook (0730)

The site HSG 30 is a legacy housing site carried forward from the adopted LDP, which has been subject to examination. The Council intends to prepare a place brief for the site that will be subject to consultation with the community. The Plan sets out a series of development principles for the site in Policy Place 35. The Plan seeks to deliver open space improvements alongside housing development on approximately half the site. **No modification proposed**

### SEPA (0012)

Criterion i of Place Policy 35 requires a flood risk assessment to inform the development of this site.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

### Living Streets Edinburgh Group (0486)

Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. Place 31 (g) requires that proposals contribute towards the specified transport infrastructure. This includes enhanced bus provision and active travel routes. Policy Inf 7 encourages private car parking free or low car parking developments. **No modification proposed**

## **HSG 40: Edmonstone**

### SEPA (0012)

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

### Association for the Protection of Rural Scotland (0334)

The site is now part of the urban area but is still designated as a Special Landscape Area, a Local Nature Conservation Site and a Local Biodiversity Site which will inform the consideration of any development. **No modification proposed**

### Pawel Stankiewicz (0445)

Policy Env 20 protects trees and applies to all trees, including those outwith a tree protection order. It is not necessary to restate this at Place 36.

Place 36 (g) sets out the road mitigation measures. Proposals coming forward will be assessed against Policy Inf 4 which addresses impacts and mitigation. The detail of mitigation measures will be considered through the planning application process. **No modification proposed**

### Living Streets Edinburgh Group (0486)

Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. Place 31 (g) requires that proposals contribute towards the specified transport infrastructure. This includes enhanced bus provision and active travel routes. Policy Inf 7 encourages private car parking free or low car parking developments. **No modification proposed**

## **H86: BioQuarter**

### Edinburgh BioQuarter Partners (0478)

The Council considers referring to the BioQuarter as an 'employment centre' is justified. The Council sets out its response to this matter in detail in Issue 34: Economy Proposals.

The Plan has already allocated the BioQuarter as site H86 and the development principles set out in policy Place 31 make it clear it has been allocated for a mixed use development.

Map 1 of the Plan already identifies the site as a major new development area, as delineated by the site's red boundary outline.

The Council considers that the details of the proposals for the BioQuarter are still emerging in discussion with the BioQuarter partners. The Plan sets out high level

development principles in the Place policies to guide development proposals. These principles will be developed further, taken forward and more clearly defined in the BioQuarter master plan as referred to in paragraph 3.79. Therefore, the Council does not consider it necessary or justified to set out further detail in the development principles, and furthermore, introducing more specific details reduces the flexibility of the policy to accommodate subsequent changes to the proposals as they evolve as part of the master plan preparation process. **No modification proposed**

BDW Trading (0350), Murray Estates (0197), SEEDCo (0198), Taylor Wimpey (0200), Persimmon Homes (0495), Robertson Residential Group Limited (0490)

The alteration of the mix of uses at the Edinburgh BioQuarter is supported in principle by the Edinburgh BioQuarter partners as a means of achieving a broader mix of uses on the undeveloped parts of the site, to support existing and future life science research uses. It is entirely consistent with strategy of the Plan to support mixed use development on existing allocated or brownfield sites. **No modification proposed**

BDW Trading (0350), Murray Estates (0197), SEEDCo (0198), Taylor Wimpey (0200), Persimmon Homes (0495), Robertson Residential Group Limited (0490), CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), SEEDCo (0198), Hallam Land Management (0615)

The Council is of the view that Choices set out a sufficient consultation on options for development for the BioQuarter as identified through both the text and mapping of Choices, and also through the Housing Study (CD026) and Appendix D. In addition, responses to the Choices consultation included reference to the potential for the type of development set out in the Proposed Plan, demonstrating how people understood what was being proposed. As a result, the Council considers the proposals are reasonable and justified. The Council sets out its position in relation to these issues in detail in Issue 39 Consultation. **No modification proposed**

Robertson Residential Group Limited (0490), SEEDCo (0198), Taylor Wimpey (0200), Murray Estates (0197), BDW Trading (0350), Stewart Milne Homes

The Council considers the impact on business, including the Edinburgh BioQuarter is not as significant or extensive as alleged in the representations. The Council sets out its position in detail in its responses in Issue 3: Delivery of the Strategy. **No modification proposed**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The proposals for the Edinburgh BioQuarter have evolved since the outline business case was approved. Edinburgh BioQuarter Partners support the principle of a higher number of homes on the site to support the existing and future life science research. In addition, Policies Econ 2 Commercial Development and Env 26 Housing density support this approach. As a result, the Council considers the revised figure is justified. **No modification proposed**

Inverdunning (Hatton Mains) Ltd (0427)



The proposals for the BioQuarter have evolved since the outline business case was approved. Edinburgh BioQuarter Partners support the principle of a higher number of houses on the site to support the existing and future life science research. The purpose of the housing figure is to identify the quantity of housing that would be supported on the site, not for the purposes of programming what is likely to be delivered during the Plan period.

**No modification proposed**

Hallam Land Management (0615)

The alteration of the mix of uses at the Edinburgh BioQuarter is supported in principle by the Edinburgh BioQuarter partners, and is a means of achieving a broader mix of uses on the remaining undeveloped parts of the site to support existing and future life science research and is entirely consistent with strategy of the Plan to support mixed use development on existing allocated or brownfield sites. The Council considers the location of the BioQuarter to be sustainable as it is located on a major public transport corridor with good access to services. In addition, it is located adjacent to the safeguarded route for the tram extension. The site is an existing allocation and does not involve the allocation of a new greenfield site. **No modification proposed**

Gilmerton & Inch Community Council (0716)

Criterion f and g of Policy Place 31 set out the development principles with regard to infrastructure. These matters will be considered and resolved through the master plan and subsequent development management process. **No modification proposed**

Simon Thomson (0248)

The alteration of the mix of uses at the Edinburgh BioQuarter is supported in principle by the Edinburgh BioQuarter partners, and is a means of achieving a broader mix of uses on the remaining undeveloped parts of the site to support existing and future life science research and is entirely consistent with strategy of the Plan to support mixed use development on existing allocated or brownfield sites. **No modification proposed**

Bo Adams (0363)

The Plan sets out high level development principles in the Place policies to guide development proposals. These principles will be developed further, taken forward and more clearly defined in the BioQuarter master plan as referred to in paragraph 3.79. Therefore, the Council does not consider it necessary or justified to set out further detail in the development principles. **No modification proposed**

SEPA (0012)

Criterion i of Place Policy 31 requires a flood risk assessment to inform the development of this site.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

#### The Association for the Protection of Rural Scotland (0334)

Development principle c requires development to respect the sites location and building heights need to be managed to protect the landscape character. The preparation of the master plan will give the opportunity to strengthen and address this matter in further detail.

**No modification proposed**

#### Living Streets Edinburgh Group (0486)

Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. Place 31 (g) requires that proposals contribute towards the specified transport infrastructure. This includes enhanced bus provision and active travel routes. Policy Inf 7 encourages private car parking free or low car parking developments. **No modification proposed**

#### University of Edinburgh (0464)

The role of Policy Place 31 is to sets out a series of broad development principles to guide development within the BioQuarter. In paragraph 3.79 there is a commitment to prepare a master plan with regard to life science research and directly related commercial developments. The Council considers the role of the University could be more clearly articulated in the master plan.

#### **H87: Duddingston Park South**

#### Inverdunning (Hatton Mains) Ltd (0427), Simon Thompson (0248)

The Council's position on the spatial strategy is set out in detail in its responses to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have subsequently come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable. The plan continues to identify 483 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. **No modification proposed**

#### SEPA (0012)

Appendix D of the Plan requires a flood risk assessment to inform the development of this site.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

## **H88 Moredun Park Loan**

Linda Stark (0670)

The Council considers Policy Inf 3 Infrastructure Delivery and Developer Contributions requires development to deliver or contribute towards education, and healthcare infrastructure to mitigate the negative impacts of development and that this will address the issue. **No modification proposed**

The Council considers Policy Env 33 Amenity requires development to demonstrate that the amenity of occupiers will not be adversely affected by privacy or immediate outlook. This will be considered at the planning application stage. **No modification proposed**

Iain Watt (0295), Edith Watt (0097), Scott Cockburn (0034), Bethany Cockburn (0036), David Lewendon (0699), Irene McQueenie (0045), Sandra Mills (0132), Sandra Mills (0132)

A key objective of the Plan is to create a city where you do not need a car to move around and the Plan is seeking to support development where private car use is not required. As a result, the Council considers that the redevelopment of the car park for a small scale infill development is justified and will have the benefit of helping to create a more active frontage to Moredun Park Loan. With regard to parking associated with the new development, it will be required to meet the requirements of Policy Inf 8 Design of Car Parking. **No modification proposed**

## **H89 Moredun Park View**

Linda Stark (0670)

The Council considers Policy Inf 3 Infrastructure Delivery and Developer Contributions requires development to deliver or contribute towards education, and healthcare infrastructure to mitigate the negative impacts of development and that this will address this issue. **No modification proposed**

The Council considers Policy Env 33 Amenity requires development to demonstrate that the amenity of occupiers will not be adversely affected by privacy or immediate outlook. This will be considered at the planning application stage. **No modification proposed**

Jennifer Mernlees (0798), Gilmerton & Inch Community Council (0716)

A key aim (10) of the Plan's strategy is to deliver mixed use housing led development. The redevelopment of the site would provide the opportunity to provide a new community centre as part of the mixed development. The Council considers this is sufficiently clear, however, if the reporter is so minded, the Council would not have an issue if this is amended to identify re-provision of the community centre as a development principle in Appendix D of the Plan.

## **H90: Morrisons at Gilmerton Road**

Gilmerton & Inch Community Council (0716)

The Council considers Policy Inf 4 of Transport Infrastructure requires housing proposals to demonstrate that local transport impacts can be addressed where this is relevant and necessary to the proposal. **No modification proposed**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thompson (0248)

The Council's position on the spatial strategy is set out in detail in its responses to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable. The plan continues to provide 483 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. **No modification proposed**

### **H91: Liberton Hospital/Ellen's Glen Road**

Samantha Cameron (0240)

Policy Place 34 sets out development principles for this site. Principle m requires a flood risk assessment to inform the development and design/layout of the site. **No modification proposed**

Bruno Longmore (0455)

Policy Place 34 sets out development principles for this site. Principle d requires new development to be set back from the top of the bank of Stenhouse Burn, and therefore recognises this sensitive area. Principle c requires direct access to the site from Lasswade Road with Ellen's Glen Road and Malbet Wynd functioning as additional access points. In addition, Principle k requires development to provide or contribution towards active transport and principle l requires development to contribute towards public transport improvements which the Council considers is consistent with the Plan's aim of reducing private vehicle use/improving mode share. **No modification proposed**

Liberton & District Community Council (0084)

The Plan sets out high level development principles in the Place Policy 34 policies to guide development proposals. These principles will be developed further, taken forward and more clearly defined in the master plan as referred to in the policy text. Details with regard to access arrangements will emerge as part of the master plan and planning application processes. Reference to re-use of Liberton Hospital means the building, not its current health use. The Council will engage with communities/stakeholders when preparing master plans or development briefs. **No modification proposed**

SEPA (0012)

Policy Place 34 sets out development principles for this site. Principle m requires a flood risk assessment to inform the development of this site.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

James McKenna (0376)

Policy Place 34 sets out development principles for this site. Criterion a require the housing development to respect the landscape setting of the site, creating a sustainable place that can retain its special character. The Council considers this can be achieved through the provision of new connections and open spaces whilst still delivering the number of houses envisaged. As set out in the Council's responses in Issue 12: Density, the Council considers high density development can be delivered without compromising placemaking. **No modification proposed**

Suzanne Baxter (0237), James McKenna (0376), Amy Pickering (0057), Jim Henry (0096), Catherine Longmore (0508), James Thin (0141), Francesca Migliorini (0502)

Policy Place 34 sets out development principles for this site. Principle a requires the housing development to respect the landscape setting of the site, creating a sustainable place that can retain its special character. Principle c requires direct access to the site from Lasswade Road with Ellen's Glen Road and Malbet Wynd functioning as additional access points. These principles will be developed further, taken forward and more clearly defined in the master plan as referred to in the policy text. Details with regard to access arrangements will emerge as part of the master plan and planning application processes. **No modification proposed**

Suzanne Baxter (0237), James McKenna (0376)

Policy Place 34 sets out development principles for this site. Principle i requires development to provide or contribute towards education and health care infrastructure. Contributions will be taken in accord with Policy Inf 3 of the Plan. **No modification proposed**

Suzanne Baxter (0237)

Policy Place 34 sets out development principles for this site. Principle l requires development to contribute towards public transport improvements which the Council considers is consistent with the Plan's aim of reducing private vehicle use/improving mode share. **No modification proposed**

Coral MacRury (0085)

Policy Place 34 sets out development principles for this site. These include requirements for the provision of a new local greenspace and new outdoor play facilities alongside housing. **No modification proposed**

Living Streets Edinburgh Group (0486)

Design principles for footpaths and cycle routes are set out in the Edinburgh Design Guidance (CD047). The design and priority would be appropriately addressed through the planning application process on a site specific basis. Place 31 (g) requires that proposals contribute towards the specified transport infrastructure. This includes enhanced bus provision and active travel routes. Policy Inf 7 encourages private car parking free or low car parking developments. **No modification proposed**

## **H92: Gilmerton Dykes Street**

Gilmerton & Inch Community Council (0716)

The Plan sets out development principles for smaller sites in Appendix D. One of the principles is to provide pedestrian/cycle links and green/blue links connecting Gilmerton Dykes Street improving the connectivity to the quieter Kilngate Brae. In addition, issues such as road safety will be addressed through the planning application process. **No modification proposed**

## **H94: Old Dalkeith Road**

Tiger Developments Ltd (0602)

The Plan identifies sites for housing led mixed use development. There is no student housing requirement figure which the Plan has to provide for. Any proposals for student housing brought forward would need to be consistent with policies and proposals set out in the Plan, including Policy Hou 6 Student Accommodation. **No modification proposed**

Gilmerton & Inch Community Council (0716)

The Council considers the redevelopment of the brownfield site for housing is unlikely to have any negative implications for ambulance services using Old Dalkeith Road. **No modification proposed**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thompson (0248)

The Council's position on the spatial strategy is set out in detail in the responses to Issue 2 Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable. The plan continues to provide 436 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. **No modification proposed**

SEPA (0012)

Appendix D sets out technical requirements for housing proposals and requires a flood risk assessment for this site.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

#### **H95: Peffermill Road**

#### **Grange/Prestonfield Community Council (0192)**

64 Peffermill Road is not part of H95. **No modification proposed**

Inverdunning (Hatton Mains) Ltd (0427), Simon Thompson (0248)

The Council's position on the spatial strategy is set out in detail in the responses to Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. There is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development. Deliverability of sites is covered under Issue 20: Assessment of Housing Land Supply. All allocated sites are considered to be deliverable. The plan continues to provide 483 hectares of land for business/industry/storage use and has identified additional land for the relocation of businesses where they are unable to be integrated into mixed use development. **No modification proposed**

#### SEPA (0012)

Appendix D sets out technical requirements for housing proposals and requires a flood risk assessment for this site.

Policy Env 36 requires that detailed applications provide a surface water management plan and should comply with the Council's Flood Risk and Surface Water Management Plan Requirements Guidance (CD077). Policy Env 35 addresses flood risk. It is an established practice to consult with the Council's flood prevention officer through the planning application process. **No modification proposed**

#### **Housing Development – non specific**

Robyn Kane (0091)

Policy Inf 3 Infrastructure Delivery and Developer Contributions requires development proposals to mitigate the impacts of development on healthcare by delivering or contributing to primary healthcare capacity by providing new facilities or extending existing facilities. **No modification proposed**

Bo Adams (0363)

The land south of Frogston Road East is within the green belt. A key aim (Aim 2) of the Plan is to direct new development to and maximise the use of brownfield land rather than greenfield land. Where greenfield land has been identified for housing development it is in the context of delivering housing led mixed use development on sites previously identified

for development, but re-envisaging the allocated sites in terms of the mix and balance of use, i.e. West Edinburgh. The Council considers there is no need for additional greenfield land to be identified for development. The Council considers there is an adequate provision of housing land supply, that there is a range of types of sites identified e.g. large, small, brownfield and greenfield etc, that proposed densities can be achieved and allocated sites are considered deliverable in the period of the plan. The Council sets out its position in relation to these issues in detail in Issue 20: Assessment of Housing Land Supply. **No modification proposed**

Reporter's conclusions:

Reporter's recommendations:



<b>Issue 9</b>	<b>Suggested Additional Greenfield Sites</b>			
<b>Development plan reference:</b>	<b>Env 18: Development in the Green Belt and Countryside</b>	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Aviagen (0365)  Azad Murdochy (0361)  Barratt David Wilson Homes (0677)  BDW and Catchelraw Trust (0209)  BDW Trading (0678)  BDW Trading and Taylor Wimpey (0199)  Bo Adams (0363)  Cala management (0180)  Cala Management (0316)  Calex Group Ltd (0556)  Catchelraw Trust (0137)  Defence Infrastructure Organisation (0124)  Dunedin Canmore HA (0766)  Esk Property LLP (0726)  Glenmorrison Group (0600)  Gordon Henderson (0164)  Hallam Land (0457)  Hallam Land (0615)  Inverdunning (Hatton Mains) Ltd (0427)  John Brady (0353)  Juniper Residential Ltd (0786)  Kim Denholm (0294)  Landowner of East Foxhall (0544)  MacTaggart and Mickel Homes (0312)  Miller Homes (0256) </td> <td> Miller Homes and Wheatland Farming Partnership (0592)  Miller Homes Ltd (0649)  Murray Estates (0197)  Nat West (0477)  Robertson Residential Group (0537)  Roseberry Estate (0618)  Roseberry Estates (0618)  Scottish Enterprise (0760)  SEEDCo (0198)  Simon Thompson (Glenpark Homes) (0248)  Spire Healthcare Ltd (0719)  Springfield Properties (0239)  Stewart Milne Homes (0118)  Stirling Developments Ltd. (0303)  Stoddart Family (0749)  T Klan (0307)  Tarmac (0244)  Taylor Wimpey (0200)  Taylor Wimpey (0770)  Taylor Wimpey and Hallam Land (0603)  The general teaching council for Scotland (0094)  University of Edinburgh (0464)  West Craigs Ltd. &amp; Dunedin Canmore (0352)  Wight PDL (0078) </td> </tr> </table>			Aviagen (0365) Azad Murdochy (0361) Barratt David Wilson Homes (0677) BDW and Catchelraw Trust (0209) BDW Trading (0678) BDW Trading and Taylor Wimpey (0199) Bo Adams (0363) Cala management (0180) Cala Management (0316) Calex Group Ltd (0556) Catchelraw Trust (0137) Defence Infrastructure Organisation (0124) Dunedin Canmore HA (0766) Esk Property LLP (0726) Glenmorrison Group (0600) Gordon Henderson (0164) Hallam Land (0457) Hallam Land (0615) Inverdunning (Hatton Mains) Ltd (0427) John Brady (0353) Juniper Residential Ltd (0786) Kim Denholm (0294) Landowner of East Foxhall (0544) MacTaggart and Mickel Homes (0312) Miller Homes (0256)	Miller Homes and Wheatland Farming Partnership (0592) Miller Homes Ltd (0649) Murray Estates (0197) Nat West (0477) Robertson Residential Group (0537) Roseberry Estate (0618) Roseberry Estates (0618) Scottish Enterprise (0760) SEEDCo (0198) Simon Thompson (Glenpark Homes) (0248) Spire Healthcare Ltd (0719) Springfield Properties (0239) Stewart Milne Homes (0118) Stirling Developments Ltd. (0303) Stoddart Family (0749) T Klan (0307) Tarmac (0244) Taylor Wimpey (0200) Taylor Wimpey (0770) Taylor Wimpey and Hallam Land (0603) The general teaching council for Scotland (0094) University of Edinburgh (0464) West Craigs Ltd. & Dunedin Canmore (0352) Wight PDL (0078)
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<b>Provision of the development plan to which the issue relates:</b>	Proposals for development in Green Belt and Countryside policy area.			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>Site: 1. Liberton Tower Mains</b></p> <p><u>Glenmorrison Group (0600)</u></p> <p>An additional site should be identified at Liberton Tower Mains as an appropriate housing site for elderly living and site removed from greenbelt. This would include appropriate wording to ensure the local environmental and design impacts of development are</p>				

acceptable.

Allocation of land at Liberton Tower Mains for provision of elderly care housing and inclusion of a policy within the City Plan Strategy would reflect the requirements in this regard by Scottish Ministers in the 2019 Planning Act.

The landholding at Liberton Tower Mains comprises an existing mixed-use complex of buildings (West Plot) and associated land (East Plot). The existing uses within the building complex include education, housing and business. However, there is no remaining element of the original farming use and its current designation within the green belt is at odds with stated green belt purposes. This was confirmed by the approval of a dwelling house by the Council's Local Review Body (ref: 19/04204/FUL).

## **Site 2. Bankhead Steading: Queensferry**

### Wight PDL (0078), Roseberry Estates (0618)

Land at Bankhead Steading, Queensferry should be removed from the Green Belt and identified for mixed business, nursery and tourism uses on Map 2, 5 and the Proposals Map.

The Plan proposes to displace a significant number of active businesses so their current sites can be repurposed for housing development. Policy Econ 2 Commercial Development gives those displaced businesses the additional headache of having to also ensure 50% of their new site is also used for housing development.

The Council has given no thought to how this programme of displacement and/or redevelopment will be delivered. Each and every site will need to be project managed by either a willing landowner, a willing home builder or the Council itself through the compulsory purchase process. It appears the Council has given no thought to which of those delivery methods will suit each of the sites it is expecting homes to be built on and/or businesses relocated to. If the existing businesses can't be re-provided for on their existing sites (which seems unlikely given the lack of detailed planning for this) then in all likelihood, this policy realises the Ryden report conclusion that existing businesses will have to relocate to areas outwith the city.

There doesn't seem to be anywhere in terms of a table to identify new Business Allocations, only Table 13 Areas of Economic Importance does this. Should one be produced, then an allocation should be incorporated for the Bankhead development or included in Table 13.

Case for this development is strong and are unclear why we have not been supported at this stage in the plan.

The Vision document demonstrates an attractive, permeable, place with character, interest and activity, taking in to account the constraints (Oil Pipeline etc.) and informal feedback from the Community Council.

There is an identified need for this development in this location that cannot be met elsewhere in the Settlement. This need can be met on a site which can be serviced in a location with infrastructure capacity for it. The site does have potential to accommodate

new development of the type proposed without major adverse effects on visual amenity, landscape character and designations, or the setting to Queensferry and associated Green Belt. The protected view of the bridges is erroneously mapped on Station Road where the view shown is impossible to achieve other than from Hawes Brae. The proposal will achieve many of the priority actions identified in the Forth Bridges Tourism Strategy and the site meets the tests of effectiveness and deliverability.

No regard has been had to the need for a nursery in the locality; the absence of any other site to meet the need in the settlement; and the continued residential creep at Ferrymuir. Whilst Builyeon Road is delivering some commercial development, this is a very different mix (Retail Food store, Drive-Thru Food and Drink and Petrol Filling-Station/Retail Kiosk/Carwash) and unlikely to address the issue we are responding to. If small and medium sized local companies cannot expand within the locality they relocate for larger premises and never return.

The LDP states (at 2.140) that City Plan 2030 will provide land for all types of businesses big and small whether they are office based or require industrial units but delivers little for Queensferry in this regard. For a plan that claims to be delivering homes next to where people live, it does a poor job of delivering jobs near to peoples' homes, particularly in a sustainable location with infrastructure capacity to accommodate it and limited impact where it is needed.

With the pressure on existing employment sites within the city resulting from the Council's brownfield only approach to housing land (many of the proposed sites are currently operational employment uses) we would have thought this proposal, in this location, particularly at this time, might be something the Council would have found favour with.

Queensferry is subject to a limited number of proposals in this plan. Of note, however, are; the ever-increasing residential development of Ferrymuir, which was originally an employment allocation in the Rural West Edinburgh Local Plan 2006; the pending application (Ref: 21/04755/FUL) to redevelop Scotstoun House to residential; and the inadequacy of the mixed-use element of Builyeon Road to meet the requirements of local businesses.

Consultants have undertaken a review of the availability of commercial property within South Queensferry and the surrounding area (3-5mile radius) capable of accommodating a Nursery (as well as more general commercial uses) which has been submitted in support of these representations. The report has concluded that there is nothing suitable available or likely to become available for a nursery or medium sized business to relocate/expand locally. Their experience indicates that we are promoting the correct range of uses, for which there is currently strong, and potentially improving, demand.

Consultants have been commissioned to undertake a review of the infrastructure in the locality which is submitted in support of these representations. This concludes that all of the utilities required for the proposed expansion would appear to be readily available and at reasonable cost such that servicing should not pose any constraint to the proposed development.

### **Site 3. Clerwood House**

The General Teaching Council for Scotland (0094)

Remove Clerwood House from the green belt. The site would remain as a Special Landscape Area, a Local Biodiversity Site, Local Nature Conservation Site, and as part of Corstorphine Hill defined Open Space. Each, on their own, and certainly together, will ensure the area is protected from inappropriate development. There is thus no need for the land to also remain as Green Belt.

#### **Site 4. Ransfield Farm Ratho**

##### Stewart Milne Homes (0118)

Allocate Ransfield Farm, Ratho as a housing proposal in the Plan.

Representations in respect to the Housing Land Requirement and Housing Supply demonstrate a massive shortfall in allocated and deliverable housing sites in Proposed City Plan. Therefore, it is therefore essential that additional land is allocated, on sustainably located greenfield sites as necessary.

A supporting document has been prepared which considers the main opportunities and constraints affecting the site and shows an appropriate scale and form of development reflecting the character of the area.

The proposals contained in the masterplan for the site meet key planning and design objectives, including the concept of a 20 minute neighbourhood. However, the proposals are indicative and could be amended appropriately at the detailed planning stage depending on the requirements of the planning authority.

Non-identification of the site for potential housing development at the Main Issues Report stage may be partly due to a number of incorrect assumptions and conclusions in the Site Assessment contained in the Choices for City Plan 2030 Housing Study. A particular constraint of the assessments undertaken by the Council is that the areas assessed were often larger or had different boundaries to the site being promoted for development. That means that the assessment conclusions are not necessarily applicable to the site in question.

The site forms part of a larger area (Sector 5: South of Ratho) that was assessed in the Housing Study for Choices for CP2030. Therefore, the assessment conclusions are not necessarily applicable to the site. A review of the site against the criteria in the Housing Study assessment has been supplied. Summary of site assessment comments are as follows;

- Site is not in an identified SDA but that does not preclude development.
- Site is walking distance of local conveniences and employment clusters
- Site is well located to active travel.
- Site is sustainable in terms of public transport
- City Mobility Plan identifies extension of tram which could provide step change in provision.
- School capacity could be provided.
- Site could improve accessibility to the green network

## **Site 5. Land at Freelands Road**

### BDW Trading (0678)

Additional site should be added at Freelands Road Ratho for housing development for 150-200 houses.

In terms of Development Principles we would expect the following to be required – Archaeology and Protected Species Assessment. The surveys submitted confirm Visual Amenity and Landscape and Visual Impact are acceptable; Negligible Impact on Air Quality and no risk of flooding.

Additional land is required to meet needs, and to provide diversity in the land supply delivering a range and choice of housing type tenure and location, as required.

Summary of key points;

- This site is within the control of a housebuilder, with a willing landowner, and is free of ownership constraints meeting the tests of effectiveness and deliverability.
- This site lies within an existing 20 minute neighbourhood with infrastructure capacity available. Its development would not only make the most of the existing 20 minute neighbourhood, but potentially enhance and improve it (a greater catchment of population, will support improved bus services, shops etc.).
- This site is in close proximity to a variety of non car modes of transport.
- The site will not result in the displacement of business.
- Land at Freelands Road, Ratho should be considered for an immediate allocation (150-200 homes). Further land is available for longer term development to the east should this be considered prudent in the case of failure of the land supply. These should be considered as separate entities and the fate of one, not dependant on the other.
- This land meets the tests of effectiveness set out in PAN2/2010 and is shown to be effective, deliverable and sustainable.

The site has been reassessed against the findings of the Choices of City Plan 2030 Housing Study. The site was part of a larger area assessed (Sector 5: Ratho Byres). Summary of site assessment comments are as follows;

- Site is adjacent to an SDA and identified in the West Edinburgh area of search in Choices for CP2030.
- Disagree with assessment of site's ability to support active travel.
- Disagree that Ratho is not particularly well served by public transport and infrastructure mitigation measures proposed.
- Education requirements can be addressed through developer contributions.
- As a result of CALA development being built at Ratho the character of the village has changed. Will be no adverse impact on the character/setting of conservation area.
- There will be a change to the setting of the settlement it will not be a significantly adverse impact.
- Development provides the opportunity to provide accessible green spaces on site, with associated landscaping and with connections to the canal itself.
- Site is not within an area of flood risk.

- There is a need for a review of the green belt and to only identify areas which deliver the aims of the greenbelt in the long term. Site does not make any significant contribution to the green belt objectives and allocation would not prejudice the overall aims of the greenbelt. Acknowledge lack of robust boundary exists, but it could be formed.
- Prime quality farm land is not an impediment to allocating the site.

## **Site 6. North of Ratho**

### Taylor Wimpey (0770)

The Plan's strategy is overly reliant on brownfield land in existing business/industrial use. The approach of meeting all of Edinburgh's housing need solely on brownfield land is unrealistic and high-risk. This approach will inevitably fail to address housing need and demand.

To enable a sufficient volume and range of homes to be built an alternative strategy should be adopted and must make provision for housing development on both greenfield and brownfield land i.e. a blended approach. North Ratho represents an appropriate candidate for green belt release and reallocation as a new housing proposal. North Ratho offers a sustainable settlement expansion opportunity in accordance with 20-minute neighbourhood principles, as set out in the City Mobility Plan. In support of Edinburgh's housing needs North Ratho can make an important contribution to the delivery of new homes, both market and affordable, and play a significant role in helping Edinburgh meet its housing targets during the City Plan period.

It is also important that a range and choice of sites is allocated to reflect the range in need and demand, including relatively small scale sites such as Baird Road, Ratho, which can provide private and affordable family homes without reliance on large scale infrastructure interventions, site remediation and site acquisition complexities, which inevitably slow down the delivery of very large or brownfield sites.

North Ratho benefits from an accessible location with all local services and facilities (inc. shops, primary school, library, community centre, medical centre) accessible via active travel or public transport in accordance with the principles of the '20 Minute Neighbourhood' concept and current guidance including Planning Advice Note 75 'Planning for Transport'. This is supported by the recently published City Mobility Plan.

North Ratho can be developed in a manner that maintains the identity, character and landscape setting of the settlement. Development will integrate sensitively with the surrounding landscape without the loss of landscape-scale land of value to the strategic green network.

North Ratho's allocation for housing within City Plan will allow it to be included within education capacity considerations and contribute towards a planned sustainable solution to education infrastructure across West Edinburgh. Community infrastructure capacity is not a barrier to development at North Ratho progressing development.

North Ratho represents an effective and deliverable site having been shown to be free of the seven specified constraints identified by Planning Advice Note 2/2010, namely

ownership, physical, contamination, deficit funding, marketability, infrastructure and land use.

The submitted North Ratho Development Framework presents a considered strategy which will allow development of the site to progress in a logical, sustainable and sensitive manner, consolidating the existing settlement pattern and affording Ratho an improved, robust and defensible Green Belt boundary.

Overall, North Ratho is ideally positioned to make a significant contribution towards City Plan 2030 meeting its housing targets helping to address housing need and demand during the City Plan period.

## **Site 7. Baird View, Ratho**

### Tarmac (0244)

It is acknowledged that the aim of the LDP is to promote and deliver mixed use communities in sustainable locations, and Tarmac shares this vision for Ratho. However, we are concerned that the spatial strategy through the housing land supply will not facilitate these sustainable objectives.

The densities identified within the allocated sites (Part 4 Table 2) are unlikely to be achieved and despite the generosity allowance this is likely to result in a shortfall of supply over the plan period.

If/when a housing land shortfall is identified the prospect of housing site in a greenfield location gaining consent is minimal. The restrictions imposed through Hou 4, together with other restrictions in policies such as Env 18, will make it nigh on impossible for a developer to present an unobjectionable proposal to the decision makers.

The Proposed Plan either needs to allocate acceptable greenfield housing sites, such a Baird view, or relax the policy restrictions to ensure greenfield sites have a legitimate chance of gaining consent.

Bairdview will increase potential patronage making existing supported services more viable.

A masterplan and background technical information demonstrating the site would be effective and deliverable has been submitted. The site is surplus to Tarmac's quarrying requirements.

If each of the Plan's aims remain in the LDP we have assessed these against the proposal using the evaluation matrix below. Tarmac suggest that these should be the key sustainability tests that are taken into consideration by the Reporter as these are derived directly from the LDP.

#### **LDP Objective and Response**

20 Minute Neighbourhoods and a place-based approach to mixed use walkable communities. -- The proposal potentially delivers a 20-minute walkable neighbourhood through a 'place-based' approach. The masterplan illustrates the creation of high quality, high density, mixed-use and walkable community, linked by better active travel and public

transport infrastructure, green and blue networks bringing community services closer to homes. It transforms the rhetoric into a feasible and viable proposition in this location.

Maximising the use of brownfield rather than greenfield land. -- Proposed development incorporates the vacant and derelict concrete batching works. The brownfield element of the site is approximately 35% of the gross development area. It delivers a sustainable and integrated new neighbourhood for West Edinburgh.

Setting Out Place Briefs and Local Place Plans -- The Proposed Masterplan for Bairdview sets out Place Policies and Development Principles. It also establishes a Place Brief to guide development and to integrate new services supporting Local Place Plans to maintain a sustainable community. As such it takes a wider view of development needs, infrastructure and services within Ratho.

Net Zero buildings and zero carbon infrastructure and technologies -- New buildings would be net-zero and more resilient to climate change. The plan would support the delivery of heat networks and energy infrastructure development, to assist the city's transition to net-zero. Some of this is clearly beyond the scope of development planning and falls within the gambit of Building Control Regulations. Where this is the case the LDP should be altered accordingly.

Implementing environmental policies to deal with climate change -- The proposals fully address climate change mitigation and adaptation through compliance with relevant policy and guidance. Indeed the Bairdview proposals offer significant environmental benefits for the Ratho community.

Delivering land to meet housing needs and 35% affordable housing -- The allocation is specifically intended to meet Edinburgh's housing needs over the next decade. It would deliver a minimum 35% affordable housing contribution in line with the new affordable housing policy proposed by the LDP. Unlike some other proposals Tarmac has taken the required quota into its viability calculations.

Protecting housing stock and the amenity of existing housing areas -- Development does not adversely affect the amenity of existing residential neighbourhoods in Ratho.

Infrastructure first approach – schools, healthcare, sustainable transport, energy and waste -- Adopting an 'infrastructure first' approach, directing new development to where there is existing infrastructure capacity. Tarmac has considered these issues. The Master Plan proposes new and expanded community infrastructure including schools, healthcare, sustainable transport, energy, and waste to support housing and mixed use proposals.

Consultative approach with communities -- A consultative approach has been taken with the local community and stakeholders to address future infrastructure, healthcare and education requirements within Ratho. The proposals seek a commensurate level of growth and balances this with new facilities and service improvements. (see supporting documents)

Delivering economic land use needs including local centres as part of a mixed-use housing led approach -- Development at Ratho would assist in delivering the West Edinburgh Strategy. It also makes provision for a Local Centre as part of housing-led mixed-use development. This approach supports existing and future employment land



allocations needed by a growing city rather than displacing these with housing and forcing employment into inaccessible and peripheral locations. Indeed, Tarmac finds the Council policy approach to employment land confusing and contradictory.

The matrix demonstrated excellent alignment with the aims and objectives of the Proposed LDP as well as close alignment with wider national and regional strategies including the West Edinburgh Strategy.

In terms of housing development, a key anchor underpinning sustainability is the Housing Needs and Demand Assessment (HNDA). The Proposed Plan has a lack of clarity over precisely what figures are being used and how these have been interpreted across different tenures. This in our view will constrain supply and will exacerbate externalities such as affordability.

The 20-minute neighbourhood concept has been subject of a scoping assessment by Public Health Scotland. This was not available at the Choices stage of the Plan.

The 20 minute neighbourhood approach taken by the City Council appears to have major deficiencies and ignores the potential for revitalising existing communities and regenerating parts of the city which are in need of regeneration and investment. Under the Proposed Plan Ratho will not share any investment over the Plan period.

### **Site 8. Craigiehall Estate**

Hallam Land (0615), Defence Infrastructure Organisation (0124), Defence Infrastructure Organisation (0665)

The brownfield nature of Craigiehall should be acknowledged within City Plan 2030, and the requirement to secure the future of the heritage and landscape assets across the site as part of a masterplanned approach. The Proposed City Plan 2030 must provide an appropriate policy context for the site to come forward and for its future to be secured.

The Craigiehall site is acknowledged by the Council, and by Government Reporters in previous LDP Examinations as being brownfield. The site is considered to represent a significant brownfield opportunity within the greenbelt.

The same reasoning continues to apply to the site, and the development of the site would support the overall strategy and aims of City Plan 2030.

The Craigiehall site represents a significant brownfield opportunity within the greenbelt. The development of the site will assist in facilitating the refurbishment of existing listed buildings across the site, and securing its landscape setting, which should be acknowledged in the emerging LDP.

Discussions with the Council around the future of Craigiehall acknowledge that a sustainable future for the site is required to facilitate the refurbishment of the listed buildings across the site and indeed its landscape setting. Notwithstanding discussions with the Council around the nature and extent of uses across the site, a policy context should be provided to recognise the exceptional circumstance of the site. Development proposals in that context can be considered on a case by case basis.

The current policy context, and fairly restrictive green belt policies in place, will inhibit the ability to secure a future use for the site and will in all likelihood impact upon the ability to protect and preserve the heritage and landscape asset contradicting national policy. The continued identification of Craigiehall in the Proposed Plan as falling solely within the green belt contradicts the Council's own strategy to maximise the use of brownfield land.

It would be reasonable that the brownfield nature of Craigiehall should be acknowledged within City Plan 2030, and the requirement to secure the future of the heritage and landscape assets across the site as part of a masterplanned approach. The Plan must provide an appropriate policy context for the site to come forward and for its future to be secured. In this scenario other existing designations would be retained. The site would continue to be identified as a Historic Garden / Designated Landscape, bounding the green belt, which would continue to support the wider green belt objectives in terms of protecting landscape setting. However the removal of the site from the green belt would provide a more positive planning policy position to secure a long term viable use for the vacant brownfield site, as well as ensure the preservation of the important heritage assets on the site.

In the event that the site is not removed from the green belt it is respectfully submitted that the Council should give significant consideration to formally recognise Craigiehall as a development site, with an associated place-based policy. The Council have provided development principles relating to other similar sites within the green belt, including Heriot Watt and RBS Gogarburn. A similar approach is advocated in the context of Craigiehall.

Craigiehall is identified within the Edinburgh Greenbelt notwithstanding that it clearly is a non-conforming area with established employment and housing uses. Considerable investment is required in the existing estate and it is clear that there is available infrastructure without constraint to allow a sustainable neighbourhood to be established.

Craigiehall is identified as being within the greenbelt where specific policy tests apply in accordance with SPP and SDP1. The Proposed Plan is using both countryside and green belt designations interchangeably to preclude development without focussing on the critical tests for sustainable development.

This outcome relates to the importance of the built and natural environment and the 20-minute neighbourhood. The masterplan for Craigiehall preserves these fundamental values as part of a new planned approach. The 20-minute neighbourhood concept has been subject of a scoping assessment by Public Health Scotland. This was not available at the Choices stage of the Plan.

Reference is made to aspirations in relation to amenities, services and a choice of housing and reference to sustainable growth place policies and sustainability assessments. However, the approach taken by the Council appears to have major deficiencies and ignores the potential for revitalising existing communities and regenerating parts of the city which are in need of future investment, such as Craigiehall.

The obvious implication is that restrictive and inflexible policies in relation to new development will restrict investment into the site. This ignores the potential of the area to accommodate sustainable development and utilise existing infrastructure, contrary to LDP objectives.

By virtue of its location on the edge of a Strategic Development area and the A90 public transport corridor, as well as its physical attributes, Craigiehall is a sustainable and accessible location. The location potentially provides a valuable attribute to the strategy for West Edinburgh as contained within the LDP.

Support for the development of Craigiehall is provided for within Scottish Planning Policy (SPP). SPP sets out planning should direct the right development to the right place, and Paragraph 40 promotes optimising the use of existing resources and considering the re-use or re-development of brownfield land before new development takes place on greenfield sites. It is considered that development at a unique site such as Craigiehall would create a high quality development which demonstrates the six qualities of successful places.

Whilst it is acknowledged that the Plan was published prior to the publication of the NPF4, the Draft NPF4 provides a useful policy update in the context of Craigiehall. It provides further support for the LDP's consideration of the site. It is expected that Plan will be updated to reflect the publication of Draft NPF4, and we would urge the Council to consider the wider implications across the whole plan.

Draft NPF4 Policy 30: Vacant and Derelict Land states:

"Local development plans should seek to reuse vacant and derelict land and redundant buildings as a priority including in proposals to creatively and sustainably repurpose buildings and structures."

Whilst the strategy and aims of Proposed City Plan 2030 are in accordance with Draft NPF4 Policy 30, the Council's approach to Craigiehall does not currently prioritise the reuse of vacant and derelict land or redundant buildings. The identification of Craigiehall does not support the creative and sustainable reuse of the existing site.

The arbitrary identification of Craigiehall as falling within the green belt does not reflect the reality on the ground, and furthermore is not in accordance with the strategy and aims of Proposed City Plan 2030, SPP or Draft NPF4. This adds further weight to the view that the site should be removed from the green belt and formally identified as a development opportunity, with associated place-based policy.

Consideration should be given to providing a policy context for sites such as Craigiehall to come forward and to not immediately conflict with the provisions of the development plan. Given the restrictive nature of the Council's green belt policy, an appropriate bespoke policy position should be established in respect of Craigiehall to allow for development proposals to come forward.

Craigiehall is within the current Airport Safeguarding Zone. Discussions on this matter were held with CEC at the Choices Stage where it was demonstrated that the proposals have been designed to integrate with airport uses. The proposals are designed not to prejudice long term expansion if this materialises. Regarding noise issues, these were discussed with the Council at Choices stage and the precedent of residential developments within the inner and outer noise zones, together with mitigation. Noise emissions on final approach from the east (Runway 24) already crosses Craigiehall and the Masterplan design reflects the prevailing noise contours.

Furthermore, there are inconsistencies of approach towards residential uses in this area, notably in relation to the Certificate of Lawfulness relating to 72 MoD housing stock for mainstream housing granted in 2020. This did not reference noise issues and concluded that a satisfactory residential environment can be created at Craigiehall.

In addition, and with regard to Choice 12, Hallam is concerned that there are procedural irregularities in terms of the Council's proposed brownfield strategy. These relate to SEA and Environmental Assessment of sites. Furthermore, this approach has not been subject to socio-economic assessment or Integrated Impact Assessment as is normal practice.

Issues such as risk and financial implications have also not been adequately considered, particularly in relation to CPO and the effect on programming and land release. These matters require to be integrated into the Action Plan.

### **Site 9. Craigcrook Road**

Cala Management (0180), Calex Group Ltd (0556)

Remove land off Craigcrook Road, Blackhall from the green belt. A retirement village is an appropriate future use for a site Craigcrook Road, Blackhall, Edinburgh. The site lies to the south east of Craigcrook Road, north west of Craigcrook Castle and due south of Hillpark Road, in an area of open space that is currently utilised as a paddock.

It is considered that via a landscape led development proposal for 8-10 acres that a suitable retirement village could be developed in this highly sustainable and accessible location. Via a carefully considered development proposal, a retirement village could be built which does not adversely impact on the setting of nearby Craigcrook Castle or detract from the landscape of Corstorphine Hill.

By undertaking a landscape led masterplan it is considered that low density development and the local nature conservation site can mutually co-exist.

The site at Craigcrook Road has the capacity to accommodate as a minimum some 35 detached, sensitively sited family homes with scope to accommodate up to 60 units.

The subject site comprises an area of parkland adjacent to the nearby Craigcrook Castle. The Castle grounds and Craigcrook Road form the eastern boundary and established residential development adjoins to the north. Woodland on Corstorphine Hill adjoins to the west and with a woodland edge to Ravelston Golf Course forming a boundary to the south. The study area rises from a low point of 55m on Craigcrook Road to a high point of 112m on the western boundary with Corstorphine Hill where the land continues to rise to the top of the hill. Object to the non-allocation of land at Craigcrook Road as a housing site and also to the retention of this site in the Edinburgh Green Belt.

The council has set a very ambitious housing land target which will necessitate annual housing completions never before achieved. This scale of housing development will not be delivered by the council alone or only by bringing forward brownfield (employment) land for conversion to housing. It will require a mix of sites (greenfield and brownfield) and scale of development which not only prioritises the affordable housing sector, but also

delivers a robust and balanced land supply, ensuring a variety and mix of housing by scale, tenure and market positioning.

Proposed development at Craigcrook Road can make a meaningful and important contribution to the proposed housing agenda set out in the Plan. It offers high quality housing of an appropriate scale for which there remains significant demand across the city.

Development at Craigcrook Road can make a unique and positive contribution to housing choice within the city, whilst also demonstrating that development can be accommodated within the landscape capacity of the site and its surrounds.

The proposal would not compromise the setting of Corstorphine Hill and can facilitate greater accessibility to it and its recreational benefits. Moreover, development would comply with national and local transport planning policies given its close proximity to existing amenities and public transport provision. Indeed, it is supporting by a key aim of the City Plan, that being to reduce the reliance on travel by car and promoting a healthier and more active city and communities.

The proposed development offers significant recreational benefits and enhancements to the green network. The site is not accessible to the public in its current state. Through the proposed development access will be promoted into Corstorphine Hill and its network of paths and cycle routes. The proposal will also deliver new open spaces, namely a formal park at the eastern boundary and an open space facility to secure the setting of Craigcrook Castle.

It is clear that the thrust of City Plan is to utilise land within the city and with access to existing facilities, services and infrastructure. Development at Craigcrook Road would support that agenda, being an urban site within an established residential area and with easy access by means other than the car, to local services and amenities and which can be delivered within the scope of existing infrastructure.

The council's site assessment does not specifically consider the site's inclusion within the Edinburgh Green Belt. It is CALA's opinion that removing the site from the green belt does not offend the principles which underpin that designation.

This submission seeks to justify the removal of the Craigcrook Road site from the Edinburgh Green Belt. If the site is removed from the green belt, the new boundaries are proposed in this submission. These are clear, well defined boundaries based on major features. There would also be scope to introduce additional planting within the Craigcrook site to further strengthen these boundaries.

The area of green belt covering Corstorphine Hill is an 'island' detached from that wider designation. The site at Craigcrook is located on the northern edge of this area. Its removal to accommodate sensitive low density residential development as proposed will not compromise the remainder of the green belt in this locality. The development of the site would have negligible impact on the character of Edinburgh and would not lead to coalescence. The site is an appropriate location for growth, bounded on three sides by settlement boundary and well located to public transport.

Against this background, it is clear that the site's removal from the green belt would not impact on its identity and character or the landscape setting, as evidenced through the Vision Document prepared by consultants. This is an urban site within an established residential area, as such it is an appropriate area to direct new housing development. Moreover, removing the site from the green belt and allowing small scale development as proposed, would enable public access to this local land resource which currently does not exist.

The proposals demonstrate these functions would not be compromised by the release of this land for the specific proposals set out. Long term defensible boundaries to the green belt would remain if the Craigcrook site is removed from it.

### **Site 10. Hermiston Park (East of Riccarton)**

#### Murray Estates (0197)

Object to the non inclusion of East of Riccarton site within the Green Belt and request allocated for housing development.

The majority of the Hermiston Park site was identified in Options 2 & 3 of Choices for City Plan 2030 as 'Area 4 - East of Riccarton', which is described and shown on pages 42 & 43 of Choices.

The Proposed City Plan departs from all of the housing delivery options identified in Choices. It does not allocate Area 4 or any of the other greenfield Areas identified in Options 2 and 3. Nor does it restrict the housing allocations to the brownfield sites identified in Option 1 of page 33 of Choices. Instead, broadly speaking, Option 1 has been supplemented to allocate greenfield housing sites at the previously undeveloped employment allocations at the IBG and Bioquarter for housing.

Therefore, neither of these proposals were subject to consultation or assessed at the MIR stage, and there is no explanation of why these sites have been allocated in preference to Hermiston Park, which is identified as largely suitable for development in the Main Issues Report.

The Masterplan Strategy for Hermiston Park, in its current form, has been developed over the past three years or so in detailed discussion with the Council and relevant stakeholders. Evolving development concepts have been presented to the Council and the feedback has integrated into the Strategy. The placemaking criteria and site requirements for the site identified on page 42 of Choices are the result of the cross-fertilisation of Murray Estates' proposals and the Council's input.

Support the content of Choices in respect to the site, albeit Area 4 – East of Riccarton should be extended northward to incorporate all of the land shown in the Hermiston Park Masterplan Strategy.

The Hermiston Park Masterplan identifies the following significant benefits:

- Over 4,000 new homes at an average density of 65 dwellings per hectare.
- more than 1,000 affordable homes.

- Putting new homes next to jobs.
- New sustainable transport connections that capitalise on the existing infrastructure with the potential to support the extension of the tram to the West of Hermiston.
- A new and important active travel route, by way of a 'Green Bridge', over the City Bypass
- Connect the City to the University.
- Connect the existing neighbourhoods, including Wester Hailes, to the economic and social opportunities on the City's western edge.
- Mixed use amenity in terms of employment, community, health and sports facilities.
- New schools with the opportunity for synergies with the University.
- Opportunities for complementary development to Heriot Watt's Research Park to stimulate Economic Potential.
- A vibrant, mixed use, place that will enhance the western edge of the city with low level impact on existing communities. Share the benefits of making a better, more attractive, place to facilitate Inclusive Growth.

The allocation of this site for housing would create a new urban extension to Edinburgh, linking the communities of west Edinburgh across the bypass to Heriot Watt University. Development of this site gives the Council an opportunity to increase the catchment area of Wester Hailes Education Centre which would increase the school roll considerably, improve learning opportunities and curriculum choice.

Public transport is to be provided through the site and the development can facilitate a public transport hub, including a tram/bus interchange. Connections through the site will focus on sustainable transport modes and connections to neighbouring developments and employment uses. Vehicular routes through the site will have bus priority measures and active travel routes. As well as the new Green Bridge over the City Bypass, there is also linkage via Westburn Avenue in the

South East corner of the site back to Wester Hailes, and the existing bus services to Baberton (33) could be extended.

The Hermiston Park area is within a single ownership and delivery of the site for development is fully in their control. This will ensure that there are no delays to delivering development in the short-term arising from land assembly issues.

Significant advance work has been undertaken to establish a multi-utility delivery strategy. There have been detailed discussions with Scottish Water and Scottish Water Horizons establishing that water supply and drainage infrastructure will be available to serve the development in the short-term by accessing the new A8 rising sewage main to Newbridge Waste Water Treatment Plant and the Marchbank Water main. There have also been negotiations with Scottish Energy Power Networks to address the prospect of removing the pylons and undergrounding the transmission cables that traverse the site.

A Flood Risk Assessment for the area has been undertaken, which confirms the extent of the Murray Burn flood plain, and has provided the basis for the Masterplan to locate development and green open space to avoid any flood risk.

## **Site 11. Ratho Station East**

### Murray Estates (0197)

Object to non-allocation of Ratho Station East site for housing development.

This site could be developed as a relatively small and sustainable extension to village.

Choice 12c of the LDP Main Issues Report (Choices) identified three options for “delivering homes in the most sustainable way”. Option 1 was for “Delivery by the Council and its partners within the Urban Area”. Option 2 was for “Delivery through market housing by releasing Greenfield land”. Option 3 was for a “A Blended Approach” which blended the first two options.

The Ratho Station East site is within, and at the eastern end of ‘Area 2 – West Edinburgh’, which was identified in Options 2 & 3 and described on pages 38 & 39 of Choices. Choices indicated that if the land was required to be allocated then its development could be supported.

Both the Housing Land Requirement and the housing land supply are significantly deficient, and additional housing land allocations are required.

The Plan departs from all of the housing delivery options identified in Choices. It does not allocate Area 2 or any of the other greenfield Areas identified in Options 2 and 3. Nor does it restrict the housing allocations to the brownfield sites identified in Option 1 of page 33 of Choices. Instead, broadly speaking, Option 1 has been supplemented to allocate greenfield housing sites at the previously undeveloped employment allocations at the IBG and Bioquarter for housing. Therefore, neither of these proposals were subject to consultation at the MIR stage.

The Ratho Station East site is capable of being developed independently of the wider Area 2 identified in Choices. Housing development here does not require large scale infrastructure interventions to support it and can therefore be developed immediately upon receiving planning permission and other necessary consents.

The Development Framework defines a development structure which is co-ordinated with the adjacent first phase and provides a spatial arrangement tailored to the site. This will create a coherent extension to Ratho Station, connected to local amenities within a 10 minute walk in line with the principles of a 20 minute neighbourhood.

Key features of the Development Framework are:

- The spatial arrangement provides an open network of legible streets and spaces which will create a framework for good quality homes.
- Vehicle access from the A8 is shared with the adjacent consented development.
- The open network of streets would allow the development to be connected to the adjacent development by paths or roads to ensure permeability.
- The development is co-ordinated with the reserved land for the future tram extension, and there is potential to locate a tram stop adjacent to the development.
- Green buffers are provided to the A8 and potential tram extension providing amenity, screening and enclosure to the development.
- Surface SUDS features are included as an integral part of the development.



- A green playspace is provided to create shared amenity space and a central focal point to the development.

Therefore, the Ratho Station East site should be identified as a housing proposal in City Plan and removed from the Green Belt accordingly.

## **Site 12. East of Milburn Tower**

### Murray Estates (0197)

Object to the non-allocation of the East of Millburn Tower site for housing led development, and accordingly the site should be included as a Housing Proposal.

The site is subject to a Notice of Intention to grant planning permission for residential development and other uses issued by the Scottish Ministers on 30th April 2020. This followed a call-in of the Council's decision to grant planning permission. Since then, there has been a lengthy period over which the Section 75 was prepared, and which is now completed and registered. At the time of writing, there has been a recently completed procedure by the Scottish Government, where it sought the views of interested parties on the content of the S75 and also upon the Plan itself.

Paragraph 2.59 of Plan states the following:

“City Plan defines green belt boundaries to meet these purposes, ensuring that growth requirements can be accommodated. The boundaries of the green belt shown on the Proposals Map are largely unchanged from previous local plans, with no new areas of green belt proposed for development in City Plan over those already set out in the Edinburgh Local Development Plan 2016, though amendment may need to be made if the Scottish Ministers grant planning permission in principle for the proposed development at Land East of Milburn Tower.”

We assume that planning permission will be granted for the development before the Council considers this representation, in which case they may choose to allocate the site and include it within the Urban Area of the Proposed Plan, adopting the necessary procedures to do so. Alternatively they may invite the Examination Reporter to recommend the necessary amendment to the Plan. Murray Estates would be content with either approach.

In the unlikely event that the application is refused by Scottish Ministers, and for the avoidance of doubt, Murray Estates would maintain their objection to the non-allocation of the site. Moreover, they reserve the right to make further submissions to the Proposed Plan to address the reasons for refusal.

The Reporter's Report on the call-in application, read alongside the Notice of Intention, explain the reasons for the intention to grant planning permission, including the conclusion that the proposals comprise sustainable development.

Therefore, the site should be allocated for housing-led, mixed-use development in City Plan, and removed from the Green Belt, to assist in meeting the large shortfall in the proposed plan's supply of housing relative to the Housing Land Requirement.

## **Site 13. The Drum and Drum (2)**

### SEEDCo (0198)

Drum object to the non-allocation of the Drum for housing-led development, and accordingly identify the site as a Housing Proposal.

The Drum site was identified in Choices for City Plan 2030 in Options 2 & 3 as part of 'Area 1 – South East Edinburgh', which is described and shown on pages 36 & 37 of Choices, and where it is noted that if additional housing land is required, then development here can be supported.

The Plan departs from all of the housing delivery options identified in Choices. It does not allocate Area 1 or any of the other greenfield Areas identified in Options 2 and 3. Nor does it restrict the housing allocations to the brownfield sites identified in Option 1 of page 33 of Choices. Instead, Option 1 has been supplemented to allocate greenfield housing sites at the previously undeveloped employment allocations at the IBG (Edinburgh 205) and Bioquarter for housing. Therefore, neither of these proposals were subject to consultation at the MIR stage. Object to the process by which the decision has been taken by the Council to re-allocate these greenfield sites for predominantly residential development without consultation, but not to include the Drum proposal which has been assessed as suitable for development and was identified at the consultation stage of the plan.

The Vision Document provides a detailed explanation of the opportunity for a new City District to be developed on the Drum site. It has evolved into its current form over a number of years, involving detailed and positive discussion with the Council's planning department, as well as liaison with transportation and education officers to achieve agreement on sustainable accessibility principles and that the development could be supported by existing and future school provision.

The principles for development identified on page 36 of Choices reflect those discussions and are addressed in the Vision for the Drum.

The principal components of the Vision:

- **Placemaking:** A core objective of the City Council is to create places of distinction and quality. Early design work has been to evolve a Masterplan that sets out to create a new city district; a place with a mix of uses and a mix of densities and types of homes. These homes sit amongst parks, places of work, community facilities, shops, cafes and restaurants, linked by high quality walking/cycling links and public realm, in the same way that existing City districts work. Intension is to create a place that is truly liveable, well connected and part of Edinburgh. It should be noted that this masterplan approach has been heavily influenced by the dialogue that has taken place with CEC. Importantly, both parties felt that the site's location, quality and scale warranted a fresh contextualised approach that was not dominated by standard housing methodologies. Great care was taken in considering what a City District would look like in this outer City location. The design approach, the mix of uses proposed, and the house type mix and density, are all a direct response to this contextual analysis.
- **Homes:** The Masterplan Vision has been developed in order to show the potential for approximately 3,500 homes through the creation of a number of attractive neighbourhoods with distinctive character to serve a range of needs, including a high proportion of affordable housing to meet the City Council's requirements. It should be

noted that this mixed-use masterplan was prepared in advance of the proposed policy requirement of 65 dwellings/hectare. Willing to review the density of the scheme in response to this proposed policy and, ultimately, can prepare a scheme which accords with the planning policies which are adopted.

- **Green Space:** Outwith the designed landscape of the Drum Estate, approximately 24 hectares will be provided as Green Space and comprise formal and informal parks as well as woodland, play areas, sports pitches and SuDS. Across the masterplan, and connecting the green spaces, will be a comprehensive network of walking and cycle paths.
- **Heritage:** The north of the area is distinguished by the Drum Designed landscape, which is to be left largely undeveloped and retained as Green Space. The area is now in need of enhancement in order to restore the important historic character and biodiversity.
- **Community Facilities:** Many would agree that some of the best parts of Edinburgh in which to live contain a vibrant mix of homes, shops, leisure facilities and community services. The Masterplan Vision proposes a new 'High Street' to be developed at relatively high density and creating the kind of character which one sees in other districts of the City e.g. Bruntsfield, Gorgie.
- **Schools:** A new School & Community Campus is proposed, accommodating nursery, primary and secondary schools at the heart of the new community. Further analysis and discussion with the City Council is required to establish if this is the right location for a secondary school in the context of rising school roles in the City as a whole and the various locational choices that might be made in the context of the emerging City Plan 2030.
- **Economic Development:** There is an identified shortfall of good quality and well-connected service industry accommodation in the City. It is therefore proposed to provide 7 hectares of land for the development of employment creating uses in an accessible location close to the City Bypass. In other representations we have made to City Plan we refer to the significant consequences of reallocating existing employment sites for housing. The Drum site therefore provides the opportunity for some re-provisioning for displaced businesses.
- **Sustainable Transport:** The Drum and Todhills area is located between the major thoroughfares of Gilmerton Road and the A7 Old Dalkeith Road, both of which have high frequency bus services linking the area with the City Centre and other key destinations. There is also the Shawfair Park & Ride nearby which provides a 15 minute bus service. It is also expected that new bus services will travel through the new community ensuring residents and visitors access to bus stops within a 5 minute walking distance. The area is relatively close to Shawfair Train Station, which will provide an additional mode of transport and there is an existing strategic cycle and walking corridor passing through the site which connects to the wider network serving south east Edinburgh. It is also proposed to provide a new Park & Ride facility off Gilmerton Road, one benefit of which will be to allow people coming from outside Edinburgh to leave their cars rather than going through the busy Gilmerton crossroad. The Draft City Mobility Plan and supporting Edinburgh Strategic Sustainable Transport Study identifies a number of strategic public transport interventions with the potential to extend the Edinburgh Tram along the south east corridor. The Drum site provides an opportunity for a segregated route for this extension through the site. The site lends itself to the creation of a 15/20 minute neighbourhood with its mix of uses and excellent local walking and cycling connections and also the proximity of other employment areas close by including the Shawfair Business Park and the BioQuarter.

## Drum (2)

Object to the non-allocation of Drum 2 site housing development and recommend it is allocated as housing proposal.

The site is located on Gilmerton Road to the West of the Drum Estate, and is outwith the Drum Designed Landscape.

A planning appeal for residential development on the site was refused in 2017 on marginal grounds, and this is addressed in detail below. A Design & Access Statement was prepared for the preceding planning application in 2015, and much of its content remains relevant today, albeit the surrounding area has become more urbanised as proposed developments noted in the DAS have been developed and work has begun to develop the planning permission granted for the adjacent Bernard Hunter site (permitted Masterplan attached), now known as Gilmerton Gateway.

The Drum 2 site was identified in Options 2 & 3 of Choices for City Plan 2030 as part of 'Area 1 – SouthEast Edinburgh', which is described and shown on pages 36 & 37 of Choices, and where it is noted that if additional housing land is required, then development here can be supported.

This is not the first time the site has been identified as suitable for housing. The Main Issues Report produced prior to the currently Adopted LDP identified the site (and named it 'Drum 2') as being a preferred housing allocation.

The Drum 2 site, by virtue of its separate accessibility and its physical and visual separation from the other parts of the Drum area, is capable of being developed independently of the Drum land to the south. Housing development here does not require large scale infrastructure interventions to support it and can therefore be developed immediately upon receiving planning permission and other necessary consents.

The site forms a single well-contained field separated from the wider agricultural landscape by the disused railway line.

The presence, of the busy A772 Gilmerton Road, the junction of Gilmerton Station Road and the industrial estate (now being redeveloped as Gilmerton Gateway, for a mix of commercial uses), to the south-west adds to the urban character of the area. The urbanisation of the wider area is of course quite intentional, following on from SESplan SDP's identification of South East Edinburgh as a Strategic Development Area, the development of which has been promoted by the LDP adopted in 2016.

The site is well served by the existing surrounding road network to the south-west. The A772 / Gilmerton Road provides access North into Edinburgh and South towards the A720 and Dalkeith. It also provides access to neighbouring shops and local amenities. Existing access to the site is from the A772 at the site's southern corner.

The site offers the potential to greatly improve the existing footpath and cycle network through the new neighbourhood, providing links to Gilmerton Road and existing paths within the Drum Estate. The former Millerhill to Loanhead railway line to the south-east of the site has been developed for a footpath and cycleway, which also has an urbanising

impact. This route will improve the connectivity and permeability of the area and serve to integrate the new development into the surrounding area.

The site is well placed to take advantage of surrounding local amenities. There are a number of shops, family pubs /restaurant and cafes located within a short walking distance to the application site. Gilmerton library, community centre and post office are all within a 10 minute walk of the application site. These facilities will be enhanced by the Gilmerton Gateway development, currently being developed. Gilmerton Primary School is less than a mile away.

The proposed design concept for development of the site is illustrated in Section 4.2 of the Design & Access Statement (DAS), and is based upon the following principles:

- Enhances existing woodland enclosure to the north-east and south-east of the site, forming a visual enclosure to the development;
- Fronts onto key routes, woodland and open space;
- Provides tree planting which forms a screen which minimises the visual impact of the development from the private drive into The Drum Estate;
- Creates good quality amenity space within the development;
- Integrates with the existing built environment by providing pedestrian links to Gilmerton Road and existing paths within the Drum Estate;
- Provides a mix of family homes close to local amenities and transport links.

An indicative residential layout is shown in the DAS. Existing enclosing landscape will be retained and enhanced to minimise the impact of the development and create a discreet new neighbourhood. The site has potential for generous open space with strong connections to the existing footpath and public transport networks. Connections to the new footpath and cycleway along the route of the old railway line to the east of the site will also be established.

As indicated above, the planning application and subsequent appeal were refused. The paragraphs 16-24 from the appeal decision were particularly relevant to this decision. It is recommended that the whole decision is read.

The issues are finely balanced. The Reporter concluded that the development of the site would not be out of keeping with the character of this part of Edinburgh and would not harm the setting of the Designed Landscape. However, he concluded that it would harm the landscape setting of south-east Edinburgh. Respectfully, we disagree with that conclusion, or at the very least would suggest that the degree of harm is not significant in the context of the balance of considerations in defining Green Belt boundaries and assessing landscape impact against the need to meet housing requirements. The Reporter accepted that the existence of the former railway line to the south of the site represented a defensible Green Belt boundary, and that this could be augmented by further planting. In our view this would ensure that the visual impact of new development would be acceptable. There is no disagreement that the site is very well related to local facilities and frequent public transport, and it clearly fulfils the concept of a 20-minute neighbourhood.

Furthermore, the immediately adjacent Gilmerton Gateway development of commercial uses, and which straddles the former railway, along with the creation of the

cycle/pedestrian ramp to access the former railway on the south of the railway, has in our opinion moved the urban area further south than the Drum 2 site.

The further urbanisation of the area since the appeal decision, supports the allocation of this site for residential development in City Plan. The issue of introducing additional landscaping to mitigate visual impact can be dealt with through the development management process.

#### **Site 14. South East Edinburgh**

##### T Klan (0307)

Allocate South East Edinburgh as a development site to take advantage of proposed transport improvements on Old Dalkeith Road.

Old Dalkeith Road is identified for a number of strategic transport improvements, including a tram route, operational benefits for public transport, and other active travel proposals. What is the point of all these investments if the Council is trying to have people live and work in the city centre?

Allocating South East Edinburgh as a housing led development zone will justify these significant transport improvements and associated costs.

Should expand this area to include the whole South East Edinburgh site as identified in Choices as Greenfield land releases will be needed within the plan period.

#### **Site 15. Almondhill, Kirkliston**

##### BDW Trading and Taylor Wimpey (0199)

Allocate Almondhill site for housing led uses.

The Almondhill site was identified in Choices for City Plan 2030 in Options 2 & 3 as part of 'Area 3 – Kirkliston', which is described and shown on pages 40 & 41 of Choices, and where it is noted that if additional housing land is required, then development here can be supported.

It should be noted that the Almondhill site is significantly smaller in scale than the overall area of land shown in Area 3 in Choices.

The Council's site assessment accompanying 'Choices' concluded that the area within which the Almondhill site falls is suitable for development and noted the following;

"The site should be considered as an urban extension of Kirkliston. Any development should have regard to improving Burnshot Road for active travel and public transport, upgrading the adjacent railway path as a suitable active travel route, the need for a new secondary school in Kirkliston and the lack of existing settlement boundary east of the existing urban area."

The following could be delivered as part of the development.

- There is a direct connection through the site to the railway path, which could be upgraded as part of the development.
- The secondary school has been included in the development framework. The Council has confirmed that a new secondary school will be required to serve Kirkliston regardless of additional allocations in City Plan. The potential for a new secondary school in Kirkliston has been frequently discussed at education committee and the option to locate a new secondary school in Kirkliston was consulted on in 2019 (see our separate objection to the non-allocation of a secondary school in Kirkliston).
- The landscape proposals in the development framework have been informed by a landscape visual impact analysis. No development has been proposed in the north-eastern part of the site which is the highest and most visually prominent. A generous landscape treatment for the eastern boundary of the site which could form the new settlement edge.
- The development framework accounts for the set-back required from the gas pipeline incorporating this area into an integrated open space and drainage strategy.
- Development will provide the opportunity for much improved transport routes in the area, providing links within and through the site at Almondhill, and supporting the improvement of transport facilities such as the upgrade to the railway path and supporting bus services.

It is notable that the Proposed City Plan departs from all of the housing delivery options identified in Choices.

Both the housing land requirement and the housing land supply requirement proposed in City Plan are significantly deficient, and additional housing land allocations are required.

The Vision document prepared provides a detailed explanation of the opportunity for a sustainable expansion of Kirkliston at Almondhill. The principles contained in Vision accords with the development requirements identified on page 40 of Choices.

The Almondhill site comprises 37 hectares north of Burnshot Road and would likely be the starting point for any development within Choices Area 3. Moreover, it provides a standalone opportunity for a comprehensive and sustainable community expansion. However, Taylor Wimpey & BDW Trading are able to deliver this site independently or work collaboratively with other landowners as part of a wider proposal if that is allocated in the LDP.

The key benefits set out in the Vision Document can be summarised as follows:

- Land within the site can be made available for an Education Campus, including secondary, primary and nursery schools of a size to be agreed with the Council. The Vision Document shows a potential location of the Education campus within the proposed development framework based on initial feedback from Education officers, but can be adjusted if required subject to further discussion to meet the needs of the Council.
- Provision of approximately 600 homes, depending on the density of development. A possible layout for the site has been considered, taking account of technical opportunities and constraints, landscape capacity and the existing character of Kirkliston. There are proposed zones of high, medium and low density housing, which take account of the Council's aspiration to achieve a minimum of 65 dwellings/hectare.

- The creation of a place that helps us live healthily and in harmony with the landscape; a place which caters for all stages of life – from starter family homes to downsizer homes; a place that appeals to flexible ways of living; and a place that creates community through built-in opportunities.
- Providing good proximity to services and public transport.
- Providing plentiful green open spaces.
- The creation of a place where it is a pleasure to walk or cycle, or for children to play on the street, or for people to bump into neighbours and stop for a chat.
- An opportunity for imaginative interventions related to electric vehicle charging provision and city car club usage.
- The development will make a significant contribution to the local economy, and also to the provision of community facilities and social infrastructure for the benefit of all.
- Within the proposed development we will take design inspiration from historic local settlements such as South Queensferry, Linlithgow and Kirkliston itself. The masterplan will be comprised of different character areas and spaces which will make Almondhill a rich and beautiful place to live. In doing so, our aim is to create an exemplary settlement expansion for Kirkliston, which will contribute positively to the existing settlement and the local landscape setting.

There are no technical constraints associated with the site which would prevent its development. A High Pressure Gas Pipeline runs across the site and has been accommodated within the proposed masterplan. Connection to utilities are available.

The opportunity should be taken to improve Kirkliston's potential as an exemplar 20 minute neighbourhood, this being one of the key aspirations of the plan, assisting in reducing the requirement to travel and thereby improving the existing environment.

The addition of a Secondary School in Kirkliston would go a long way towards achieving this, avoiding the need for pupils to travel long distances to other areas on a daily basis.

Kirkliston already has a number of facilities; a Primary School; nursery; leisure centre; pharmacy; doctors; convenience store; pub/restaurant etc. all of which are easily accessible by walking or wheeling. Moreover, these services would be augmented both through both provision of services and facilities on site, whilst also adding the support of more households from the development to make further services justifiable/viable in the area. New school provision is clearly already a priority.

The developers are keen to work with the council to develop proposals for this area, including incorporation of connections into surrounding cycle and pedestrian routes, linking into and providing green networks through the site and working with the council to deliver land for an education campus. They are also keen to be involved in the preparation of any place brief for the area and would be willing to work closely with any other landowners whose land may also be allocated for development in the area.

## **Site 15: Almondhill Kirkliston**

Sir Jack Stewart-Clark (0800)

The Council should take into account: 1) The need to protect the environment 2) Making certain there are sufficient educational places available at primary and secondary level,



accessible to Kirkliston residents 3) The need for additional housing in the west of Edinburgh.

It is important to preserve the beauty of the environment and specifically, make sure that Dundas Castle and its estate retains its natural beauty. I am also keen to obtain the funds to restore a number of derelict buildings. At present, we own land at Kirkliston which has been identified for education and housing in the Edinburgh Choices consultation document last year. The land is sandwiched between the north edge of Kirkliston housing estate and the new motorway and old railway.

Taylor Wimpey & Barratt Homes have submitted plans for a new high school and secondary school as well as housing. It is the purpose of this submission to ask the Council to look particularly at the educational needs of this area, as well as housing. Queensferry High School will run out of capacity in three years time. This is known from consultation with the Education authorities and discussions with the Headmaster. It is therefore paramount, that land should be identified to meet the educational needs of the area. If not, it will reach a crisis point. The area listed above at Kirkliston is by far and away, the most suitable for the building of these schools. It is accessible for all those with growing families in the relevant catchment areas and therefore, urge the Council to consider this submission favourably.

### **Site 16. East Kirkliston**

#### Miller Homes and Wheatland Farming Partnership (0592)

It is recommend Kirkliston East is allocated for 2,700 houses and mixed use development.

The site was identified within the Housing Study and Environmental Report prepared in support of the Choices for City Plan 2030. It also identified the site as forming part of a wider expansion of the settlement of Kirkliston.

The proposal is shown on the Illustrative Layout submitted in support of this representation. The proposal includes community and commercial development including the delivery of a mixed-use gateway at the southwestern corner of the site. This will include a wide range of commercial and community buildings such as community centres, retail and office space. A new school campus is also proposed, providing a new primary school, secondary school and nursery.

A supporting Site Assessment Review has been prepared to assist the consideration of the site and the proposal, taking into account the indicative proposal shown in Indicative Development Framework and the Development Framework Report. The Site Assessment Review demonstrates that there are no planning or environmental reasons why Kirkliston East should not be allocated for a housing and mixed use development in the emerging City Plan 2030.

The Council's Environmental Report sets out the Council's scoring for all sites proposed to be allocated for housing, including an allocation at Edinburgh 205. Based on the Council's own assessment of the proposed housing allocation at Edinburgh 205, it is unclear why the Council considers the site to be more suitable for housing development than other sites such as Kirkliston East.

A Site Effectiveness Statement has also been prepared in support of the allocation of the site at Kirkliston East for a housing and mixed-use development. The Site Effectiveness Statement demonstrates that Kirkliston East is an effective site in accord with the rests of PAN 2/2010 Affordable Housing and Housing Land Audits. The proposal can be delivered within the period of the emerging City Plan 2030 without external funding.

The development of the site for a housing and mixed-use development will also make a significant contribution of around 675 affordable homes based on 25% affordable housing provision.

The proposal also provides the opportunity to extend the tram network into Kirkliston, with an indicative location for a tram stop included as part of the proposal. The proposal also allows for the potential future expansion of the proposed tram route towards South Queensferry.

The proposal will also provide new road infrastructure including the potential realignment of Burnshot Road and a new loop road around the east of Kirkliston. These measures will improve road safety and provide relief from the existing traffic issues in Kirkliston by diverting traffic away from the centre of the settlement.

A review of the site at Kirkliston East against the Council's Greenfield Site Assessment as set out within the Housing Study prepared as part of the MIR has been undertaken. A review of the site against the Site Assessment as set out within the Environmental Report which supported the MIR has also been provided.

The assessments are set out within the Site Assessment Review submitted in support of this representation.

The proposal at Kirkliston East against the Council's Greenfield Site Assessment methodology has been undertaken. The Greenfield Site Assessment demonstrates that Kirkliston East is an appropriate site for a housing led development.

The Site Assessment produced against the Council's methodology for assessing sites as set out in Table 5 of the updated Environmental Report also demonstrates that the site scores favourably.

These assessments have been undertaken using the mitigation and improvements set out in the proposal in the supporting Illustrative Layout. A Development Framework Report has also been produced which explains the proposal for the site and confirms these sustainable measures.

Based on the findings of these revised assessments, the site Kirkliston East is a considered to be a sustainable development proposal. Page 6 of the Proposed LDP 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 resilient, connected neighbourhoods, in the right locations, with the right infrastructure.

The development of Kirkliston East will contribute to this objective.

This representation is also supported by an Education Infrastructure Note. The purpose of the Education Infrastructure Note is to provide an assessment of the education

infrastructure requirements arising from the impacts from new homes from the development of the site.

The proposal will deliver a new primary school to provide sufficient capacity to mitigate the impact of the proposal at Kirkliston East on the existing education infrastructure in Kirkliston. The proposal will also deliver serviced land for a new non-denominational secondary school to serve Kirkliston. This will address existing capacity pressures at Queensferry High School, and potentially other existing schools through re-zoning, whilst also providing local provision to Kirkliston.

The findings of the note are that education capacity is not an insurmountable barrier to the allocation of the site as part of the emerging City Plan 2030. The proposal can provide wider benefits to the existing community of Kirkliston by providing a new local secondary school and new primary school to alleviate existing constraints.

The developer is willing to make a proportionate financial contribution towards the cost of providing the necessary education as a result of the direct and cumulative impact of the development in accord with Circular 3/2012.

There are no planning or environmental reasons why Kirkliston East should not be allocated for housing in the emerging City Plan 2030.

### **Site 17. Muirwood Road**

#### Taylor Wimpey (0200)

Allocate site at Muirwood Road for housing development.

Our submissions in respect to the Housing Land Requirement and the supply of housing to meet that Requirement demonstrate a massive shortfall in allocated housing sites. It is therefore essential that additional land is allocated, on sustainably located greenfield sites as necessary. It is also important that a range and choice of sites is allocated to reflect the range in need and demand, including relatively small-scale sites such as Muirwood Road, which can provide private and affordable family homes without reliance on large scale infrastructure interventions, site remediation and site acquisition complexities, which inevitably slow down the delivery of very large or brownfield sites.

Therefore, are seeking the allocation of a site for housing at Muirwood Road, ranging from approximately 250 – 390 homes depending on density and whether or not a primary school is located on the site. A comprehensive design document has been prepared. This considers the main opportunities and constraints affecting the site and shows an appropriate scale and form of development reflecting the character of the area.

The non-identification of the site for potential housing development in Choices for City Plan 2030 may be partly due to a number of incorrect assumptions and conclusions in the Area Assessment contained in the Choices 2030 Housing Study. Also, it is notable that the area assessed by the Council – Baberton - is significantly larger than that the site being promoted for housing.

A review of the site against the criteria in the Housing Study assessment has been supplied. Summary of site assessment comments are as follows;

- The site is not within a SDA but that does not preclude development
- The site is within walking distance of local convenience services.
- Walking distance to employment clusters ignores alternative route via Donkey Lane.
- Access to cycle network analysis sits at odds with comments from Sustrans and information within Council's publications.
- Active travel comments at odds with comments from Sustrans and potential undermines possible funding of enhancements.
- The site is within easy walking distance of a 10 minute bus service and a mainline railway station.
- Unclear as to what the identified public transport intervention is.
- The Council is undertaking a comprehensive review of its school estate. It is possible to accommodate a new primary school on the site.
- Agree with the landscape conclusions and propose to underground the pylons.
- Agree that development can improve links to the green network. It has good access to water of Leith route and propose to put in pedestrian crossings and green landscape ribbon.
- Agree site has no flood risk.

### **Site 18. Curriemuir Vale**

#### Cala Management (0316)

Propose removing Currievale from the green belt and allocating it for housing development.

The current brownfield strategy is unrealistic and high-risk and will fail to address housing need and demand during the City Plan period. To enable a sufficient volume and range of homes to be built an alternative strategy must be adopted.

The alternative strategy must make provision for housing development on both greenfield and brownfield land i.e. a blended approach.

Proposed City Plan 2030's Spatial Strategy seeks to develop a network of 20-minute neighbourhoods and direct new development to, and maximise the use of, brownfield land rather than greenfield land.

The approach of meeting the vast majority of Edinburgh's housing need from brownfield land to be unrealistic and high-risk. Such an approach will inevitably fail to address housing need and demand during the City Plan period. It is not clear to what extent the Council can provide any certainty that the brownfield land being relied upon to deliver the City Plan 2030 strategy is either suitable or available for housing development. No evidence has been presented to indicate that the effectiveness and deliverability of these sites has been subject to a robust assessment. Fundamental information such as the willingness of owners to sell or redevelop their land, the timescales for this, or the suitability of individual sites for development (e.g. ground conditions, viability, abnormal costs) is apparently unknown. Many of the identified sites are in multi-ownership, further complicating land assembly. For these reasons many of the new housing proposals will

fail to meet the test of 'effectiveness' contained within PAN2/2010: Affordable Housing and Housing Land Audits.

At the Choices for City Plan stage of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares was vacant and ready for development and only 30 hectares benefitted from planning permission. The remainder of the land was in active alternative use – primarily business and industrial land in private ownership. There is no evidence or indication that this position has changed significantly in the intervening period. Scottish Planning Policy (2014) states at paragraph 119 "Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement". Circular 6/2013 Development Planning prioritises 'deliverability' in the site selection process at each stage of Local Development Plan preparation. City Plan 2030's approach to site selection does not comply with either Scottish Planning Policy or Circular 6/2013.

Given the significant challenges and risks the Council's brownfield first approach present to the delivery of new homes during the City Plan period, CALA believes an alternative option must be pursued if Edinburgh's housing targets are to be met. This will necessitate development on both greenfield and brownfield land i.e. a blended approach. It is essential that additional land is allocated for residential development on appropriate and available greenfield land if a sufficient volume and range of homes are to be built in the City during the plan period.

The release of greenfield land for development can be identified and planned in a manner that supports the key aims of City Plan 2030 – including the aim of delivering a "network of 20-minute walkable neighbourhoods and embedding a 'place-based' approach to the creation of high quality, high density, mixed-use and walkable communities, linked by better active travel and public transport infrastructure, green and blue networks and bringing community services closer to homes".

Land at Currievale can achieve all of these aspirations and represents an appropriate candidate for green belt release and re-allocation for housing led development.

SESplan SDP Policy 7 makes provision for greenfield housing development proposals within or outwith identified Strategic Development Areas to be allocated in Local Development Plans or granted planning permission to maintain a five years' effective housing land supply, subject to satisfying a number of criterion. Development at Currievale can progress in accordance with SESplan SDP Policy 7 principles.

CALA has demonstrated the site is 'effective' and free of any infrastructure constraints. Given the availability of existing infrastructure, development at Currievale is in accordance with the City Plan's 'infrastructure first' approach for new developments, particularly evidenced by the close proximity of the Primary Sub Station which has capacity to support a sustainable development in this location unlike the vast majority of proposed allocations in City Plan.

Development at Currievale will be in keeping with the character of the settlement and will not undermine green belt objectives. SESplan SDP Policy 12 (Green Belts) defines the purpose of Edinburgh's green belt. Development at Currievale would maintain the identity and character of Currie, it would not result in coalescence. The site occupies a sustainable location at the settlement edge and its development will consolidate the settlement pattern

and allow a revised defensible greenbelt boundary defined by the railway line to be formed.

In terms of directing development to the “most appropriate locations”, the site could scarcely be better placed given its high level of accessibility to the pedestrian and cycle network, and public transport infrastructure. The submitted Transport Appraisal has highlighted that the site is within easy walking distance of local convenience services and clearly demonstrates how the Currievale site supports the 20-minute neighbourhood concept

Planning Advice Note (PAN) 75 ‘Planning for Transport’ states that ‘A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour’ for accessibility to local facilities by walking and cycling’. All key local facilities are situated within 1,600m from the site.

Development at Currievale will maintain the landscape setting of Currie. The Edinburgh Green Belt Study (Stage 2) carried out to inform SESplan SDP identified the majority of the site as having landscape capacity to accommodate development. This included land to the north of Currie and east of Riccarton Mains Road. Since then, development has commenced at Newmills Road (HSG 37) and completed at Curriehill Road (HSG 36) and Riccarton Mains Road (HSG 35) providing further context for development.

As evidenced by the submitted Development Framework, development at Currievale will facilitate and provide opportunities for access to open space and the countryside – significantly enhancing the existing situation, where the site does not provide such access.

Currievale offers a sustainable settlement expansion opportunity in accordance with 20-minute neighbourhood principles. In support of Edinburgh’s housing needs Currievale can make an important contribution to the delivery of new homes, both market and affordable, and play a significant role in helping Edinburgh meet its housing targets during the City Plan period.

### **Site 19. Bankhead, Balerno**

Simon Thompson (Glenpark Homes) (0248)

Add new housing allocation at Bankhead, Balerno

There are a number of high-profile sites that have been allocated for housing which are very unlikely to be available for development in the foreseeable future (Seafield, Redford Barracks, Astley Ainslie Hospital) and others potentially have alternative plans (a new secondary school at the former Royal Victoria Hospital). From reviewing the proposed plans, it would also appear that a significant number of allocated housing sites are currently existing trading businesses including swathes of land in the Bonnington and Leith areas.

A broad review of the plan would indicate the Council’s strategy looks undeliverable in the timescales envisaged. It remains clear that Edinburgh will need to release additional land for housing to meet its objectives of meeting housing demand as the Capital City of Scotland. Previous representations set out the merits of two sites in my ownership at Glenbrook Road, Balerno and Bankhead, Balerno. These sites can be delivered in the City

Plan period and offer high quality housing opportunities of appropriate scale for Balerno. Previous proposals for 53 homes and 5 homes respectively would contribute to the housing supply targets and can be serviced by sustainable modes of transport being within easy walking distance of established bus routes into the City Centre and local facilities in Balerno.

Neither site would have significant landscape impacts given their contained nature by mature woodland and indeed, the site at Bankhead has been developed previously for a yard and barn and therefore should be considered brownfield. This particular site was assessed by a Reporter, in an appeal for potential glamping pods, who felt that its proximity to other dwellings made the site unsuitable for tourism use but he disagreed that development on this site should have been refused on landscape grounds which therefore makes housing on this derelict site as the only sensible option.

Given the level of housing need in Edinburgh there would appear to be no clear reason why either site should not come forward for housing in the short term. The full assessments undertaken previously are noted in supporting letters and I would ask for both sites to be allocated for housing in an amended City Plan 2030.

Having reviewed the proposed housing allocations, many of them are not deliverable to meet housing targets. The Strategy should encompass suitable, sustainable greenfield sites in addition to brownfield land to assist with meeting the affordable housing demand in full.

## **Site 20. Glenbrook Rd. Balerno**

Simon Thompson (Glenpark Homes) (0248)

Add new housing allocation at Glenbrook Road, Balerno

There are a number of high-profile sites that have been allocated for housing which are very unlikely to be available for development in the foreseeable future (Seafield, Redford Barracks, Astley Ainslie Hospital) and others potentially have alternative plans (a new secondary school at the former Royal Victoria Hospital). From reviewing the proposed plans, it would also appear that a significant number of allocated housing sites are currently existing trading businesses including swathes of land in the Bonnington and Leith areas.

A broad review of the plan would indicate the Council's strategy looks undeliverable in the timescales envisaged. It remains clear that Edinburgh will need to release additional land for housing to meet its objectives of meeting housing demand as the Capital City of Scotland. Previous representations set out the merits of two sites in my ownership at Glenbrook Road, Balerno and Bankhead, Balerno. These sites can be delivered in the City Plan period and offer high quality housing opportunities of appropriate scale for Balerno. Previous proposals for 53 homes and 5 homes respectively would contribute to the housing supply targets and can be serviced by sustainable modes of transport being within easy walking distance of established bus routes into the City Centre and local facilities in Balerno.

Neither site would have significant landscape impacts given their contained nature by mature woodland and indeed, the site at Bankhead has been developed previously for a

yard and barn and therefore should be considered brownfield. This particular site was assessed by a Reporter, in an appeal for potential glamping pods, who felt that its proximity to other dwellings made the site unsuitable for tourism use but he disagreed that development on this site should have been refused on landscape grounds which therefore makes housing on this derelict site as the only sensible option.

Given the level of housing need in Edinburgh there would appear to be no clear reason why either site should not come forward for housing in the short term. The full assessments undertaken previously are noted in supporting letters and I would ask for both sites to be allocated for housing in an amended City Plan 2030.

Having reviewed the proposed housing allocations, many of them are not deliverable to meet housing targets. The Strategy should encompass suitable, sustainable greenfield sites in addition to brownfield land to assist with meeting the affordable housing demand in full.

## **Site 21. Land at Goodtrees**

### Hallam Land (0615)

Land identified as part of this submission is located to the west of Balerno immediately adjacent to Cockburn Crescent where the opportunity for a new 20-minute neighbourhood can be integrated into the urban area. It is capable of accommodating mixed uses and being developed at a density suggested by the Council. At present the Proposed Plan does not make provision for improved facilities or services within Balerno, but these could be accrued from new greenfield development.

This land is being promoted as a housing development of approximately 300 family and affordable homes. This is an opportunity for the planned and logical expansion of Balerno at a scale that is commensurate with the location. The site has planning history and was subject to a PAN and public consultation in 2013 but considered to be premature at that time. It is currently identified as green belt.

Goodtrees Farm was promoted to the Council at the Choices stage of the LDP review. The Proposed Plan has chosen not to address matters regarding greenfield housing site releases. This will intensify competition for land and resultant values. Concerns are now re-enforced by the policy stance taken by the Council on proposed allocations as part of the spatial strategy now being adopted which forgoes a balanced or blended approach to future allocations.

Site has been assessed against the aims of the plan.

20 Minute Neighbourhoods and a place- based approach to mixed- use walkable communities:

- The proposal is in a sustainable and accessible location on the edge of Balerno with excellent linkages into local facilities and services which could be enhanced by mixed use development in association with housing.
- It potentially delivers a 20-minute walkable neighbourhood through a 'place-based' approach to the creation of high quality, high density, mixed-use and walkable community.



- A neighbourhood hub would bring community services closer to proposed dwellings at Goodtrees and would be linked by better active travel and public transport infrastructure.
- Maximising the use of brownfield rather than greenfield land ---
- Whilst no brownfield land is used the site makes the most effective use of an urban edge site with available infrastructure and services.
- It would allow planned and sustainable development to be integrated with the existing urban area making the best use of land and avoid less desirable developments elsewhere locally.
- Greenfield land take is minimal and the benefits outweigh the value of the countryside and greenbelt designation.

#### Setting Out Place Briefs and Local Place Plans:

- A place brief would be prepared for Goodtrees Farm in alignment with the Council's policies and urban design objectives.
- A Proposed Masterplan for Goodtrees as submitted at Choices stage sets out Place Policies and Development Principles. The Place Brief will guide development and to integrate new services to maintain a sustainable community.

#### Net Zero buildings and zero carbon infrastructure and technologies ---

- New buildings would be net-zero and more resilient to climate change. The Masterplan supports the delivery of an integrated heat network and energy infrastructure development, to assist the city's transition to net-zero.

#### Implementing environmental policies to deal with climate change ---

- The proposals fully address climate change mitigation and adaptation through a comprehensive Environmental Impact Assessment.
- Delivering land to meet housing needs and 35% affordable housing ---
- It is possible that approximately 115 affordable houses could be provided at Goodtrees Farm.
- It would deliver a minimum 35% affordable housing contribution in line with emerging policy in City Plan 2030.
- The allocation is specifically intended to meet Edinburgh's housing needs over the next decade as well as satisfy the ever-present requirement for new housing in Balerno.

#### Protecting housing stock and the amenity of existing housing areas ---

- Development would not adversely affect the amenity of existing residential neighbourhoods in the Cockburn Crescent area of Balerno.
- The existing infrastructure and road network would remain and be integrated into the Masterplan.

#### Infrastructure first approach – schools healthcare sustainable transport energy and waste -

- Available existing infrastructure exists in Balerno and the masterplan directs new development to existing available capacity.

- Furthermore the masterplan allows for new and expanded community infrastructure including educational contributions, healthcare, sustainable transport, energy, and waste.

Consultative approach with communities ---

- Extensive consultation is envisaged with the Community Council and other stakeholders in the area.
- This consultative approach will address future infrastructure healthcare and education requirements within the area balancing growth with new facilities and service improvements.

Delivering economic land use needs including local centres as part of a mixed-use housing led approach ---

- Land at Goodtrees Farm contains space for a small local centre supplementing existing provision in Balerno.
- The approach is part of housing-led mixed-use development and deliver policies which supports local facilities and services.

The matrix demonstrates excellent alignment with the aims and objectives of the Proposed LDP as well as close alignment with wider national and regional strategies including the West Edinburgh Strategy.

On this basis it is not clear why the LDP has not included the site as a sustainable and effective allocation.

The strategy should be amended to reflect a more balanced and sustainable mixed blended approach with a good share of greenfield release in accordance with the Choices Strategy. This is particularly important in locations such as Balerno which are subject to intense development pressures. Greater cognisance needs to be taken of housing demand and affordability together with effective delivery of the volume of land required in the city.

City Plan is not addressing housing requirements in Balerno and leaving the area open to unsustainable challenges to the land supply over the plan period. This is already occurring in other locations within the local area.

There is concern that the LDP is not conducive to future investment. It is disjointed and many of the policies are restrictive and inconsistent with the Plans' aims. There is also concern that the strategy is not deliverable and that the proposals will not be viable in economic development and housing terms.

The Proposed Plan should be amended in accordance with SPP and NPF3. There is concern that there is no supplementary guidance or equivalent in relation to best practice on 20-minute neighbourhoods and related policy objectives including Place Plans. Furthermore, there is no guidance on how local infrastructure and services can be improved in conjunction with development.

**Site 22. South of Cockburn Crescent**

Barratt David Wilson Homes (0677)

Given concerns as to the over-reliance of the Proposed Plan upon the identification of brownfield land and, concurrently, the need to bring further sustainable greenfield opportunities forward, this representation promotes a housing allocation for land directly adjacent to the southern edge of the Balerno urban area at Cockburn Crescent for inclusion within the proposed City Plan 2030.

This site is discussed in the attached document but, in summary the subjects are

- Adjacent to the existing urban area of Balerno;
- Accessible by active travel modes and not reliant upon car travel;
- are within a 20min walking distance to neighbourhood facilities, and
- it is effective and available capable of delivering up to 200no homes (private and affordable) within the Plan period,
- In the control of a committed landowner, with a track record of delivery in Edinburgh and in the ownership of a willing landowner.

**Site 23. Highfield**

Taylor Wimpey (0200)

Object to the non-allocation of land at Highfield for housing and accordingly recommend that it is included as a Housing Proposal and object to its inclusion within the greenbelt.

The Highfield site was identified in Choices for City Plan 2030 in Options 2 & 3 as part of 'Area 1 – South East Edinburgh', which is described and shown on pages 36 & 37 of Choices, and where it is noted that if additional housing land is required, then development here can be supported.

Both the housing land requirement and the housing land supply requirement proposed in City Plan are significantly deficient, and additional housing land allocations are required.

The Highfield site, by virtue of its separate accessibility and its physical and visual separation from the other parts of the Drum area, is capable of being developed independently of the Drum land to the south. Housing development here does not require large scale infrastructure interventions to support it and can therefore be developed immediately upon receiving planning permission and other necessary consents.

The Highfield site is approximately 6.7 hectares of mainly uncultivated grassland adjacent to the A7. The Council had in the past proposed that the site be used as a Park & Ride, but that was abandoned with the identification of the facility at Shawfair. As expanded upon in the Design & Access Statement, the proposed development can adopt the following principles:

- A principal access point onto Ferniehill Road.
- SUDS to the north-west of the site at the low-point of the site.
- Retention of trees wherever possible.

- The development area has been set some distance back from Old Dalkeith Road, with the existing landscape buffer retained.
- Retention of links to the green network
- A view corridor towards the City

The Highfield site is within the Assessment Area known as Drum North in the Choices Housing Study. A review of the site against the criteria in the Housing Study assessment has been supplied. Summary of site assessment comments are as follows;

- The site is within a SDA.
- The site is within walking distance of local convenience services.
- The site is within walking distance of employment clusters.
- The site does not have access to the cycle network but could be improved.
- The site can support active travel through improvements.
- The site is close to Dalkeith Road which has frequent bus services.
- Small scale nature of site means that major transport intervention not required before site is developed.
- There is likely to be secondary school capacity.
- Site is not within the Drum designed landscape is not part of the Drum estate and is well contained.
- There is no flood risk.
- Site is suitable for development

#### **Site 24. Frogston Road East**

##### BDW and Catchelraw Trust (0209)

Object to the non-allocation of Frogston Road East for housing, and accordingly recommend its inclusion as a Housing Proposal.

The Housing Land Requirement and the supply of housing to meet that requirement demonstrate a massive shortfall in allocated housing sites in the Proposed City Plan. Therefore, essential that additional land is allocated, on sustainably located greenfield sites as necessary. It is also important that a range and choice of sites is allocated to reflect the range in need and demand, including relatively small-scale sites such as Frogston Road East, which can provide private and affordable family homes without reliance on large scale infrastructure interventions, site remediation and site acquisition complexities, which inevitably slow down the delivery of very large or brownfield sites.

Therefore, seeking the allocation of a site for housing at Frogston Road East for up to 500 homes. A comprehensive design document has been prepared. This considers the main opportunities and constraints affecting the site and shows an appropriate scale and form of development reflecting the character of the area.

Technical documents have been prepared to compile a constraints and opportunities appraisal and have informed the resulting Development Framework for the site.

Also an area has been included for employment/local services into the Development Framework- employment is marked on the plan but it could also accommodate local

services. This would improve the range of services in the area contributing to the existing 20 minute neighbourhood credentials of the area.

A mobility hub could also be accommodated here which could include:

- Co-location of public transport and shared transport modes such as car club, bike/e-bike/ mobility scooter hire
- Travel information
- Safe and secure bike storage and parking
- Taxi pick up/drop off
- click and collect facilities and delivery lockers.

High standard EV charging provision can also be accommodated throughout the development.

It appears to us that the non-identification of the site for potential housing development in the Main Issues Report (Choices) may be partly due to a number of incorrect assumptions and conclusions in the Area Assessment contained in the Choices 2030 Housing Study. Also, it is notable that the area assessed by the Council in this case – “South of East Frogston Road” is significantly larger than that the site being promoted for housing.

A review of the site against the criteria in the Housing Study assessment has been supplied. Summary of site assessment comments are as follows;

- The site is within a SDA.
- This site has access to a shop and a number of shops at Gracemount, and planning to include shops and business uses within the site.
- This site is close to Broomhills Business Centre and Straiton retail park with a signal controlled crossing
- There is a proposed active travel route directly opposite the site which the development could help deliver.
- Public transport provision is good and potential for improvements to services.
- Site is within catchment of new Broomhills primary school.
- Landscape assessment shows site is broadly acceptable in landscape and visual terms and landscape proposals aim to enhance the countryside and rural environment and setting of city.
- Development will create opportunities to connect to the green strategic network.
- Development is not proposed within an area of flood risk, and will be set back.

Kim Denholm (0294)

Support the housing proposals. However, I remain very concerned that developers will exercise great pressure on Edinburgh Council to allow development along Frogston Road - both at Broomhills and at Mounthooly Loan. While I completely understand that Edinburgh Council has sought to protect these areas from further development, I strongly urge that steps are taken to guard against wildcat planning applications / appeals as developers and the Catchelraw Trust have made it very clear that they aim to progress their long term aims to build on both locations. This is unsustainable and would place an intolerable extra strain on an already struggling infrastructure. Should developers make an appeal that goes against the Plan's recommendations, the detrimental effect from

increased traffic pollution and subsequent poor air quality plus the harm to wildlife (of which there is a huge variety, including protected species such as bats and badgers) would be extreme.

While I also understand that CEC is not accepting petitions, I would like to make clear that I have an active petition against further development at Broomhills which currently stands at 1567 in the online version and approximately 250 paper signatures. This does give a very strong indication of the strength of feeling of both local residents and others who work and otherwise access the area.

#### Bo Adams (0363)

Support more development around Frogston road, nice developments with shops, restaurants, family infrastructure, active& leisure infrastructure, some pond, an outdoor heated swimming pool.

There is no mention of Kaimes area , south of Edinburgh. This place urgently needs some quality investment , Gracemount Square opposite Tesco express, could be turned into nice food quarter with a fountain and nice seating area, new swimming pool with few proper slides for families, perhaps outdoor heated pool around Frogston Road with the view to the Pentlands would be a good idea. Area needs a new high school around Frogston Road. Area has been left to neglect for ages, no quality of life at all here. If you are serious about 20 mins neighbourhoods you must invest here properly, it is the only area that hasn't seen investment in decades.

#### **Site 25. Alnwickhill Road**

##### MacTaggart and Mickel Homes (0312)

Remove the site from the green belt and allocate it for housing development. Site extends to over 8Ha, adjacent to Alnwickhill Road at Liberton, and is considered to be deliverable in the short term and is appropriate for allocation for residential development in the City Plan 2030.

The site comprises arable farmland and sits within the statutory Green Belt and a Special Landscape Area of Braids, Liberton and Mortonhall in the adopted LDP. Propose to develop 2.98ha of this land, which constitutes 35.6% of the total site area. The remaining 5.44ha of the site has potential to provide an enhanced area of open space through a series of measures, including structural planting and additional pathways which connect into the existing core path network.

The site is available now for the provision of a landscape-led and locally appropriate residential development, comprising a moderate number of new homes (100 units) within the city boundary of Edinburgh.

The site sits adjacent to the residential area of Liberton, with Blackford Hill and the Braid Hills lying further west. To the immediate east of the site beyond Alnwickhill Road lies the new residential development of Liberton Grange, on the site of the former Scottish Water landholding.

It is bounded to the east by Alnwickhill Road and is bounded by Tower Farm Riding

Stables and Braid Hills Golf Course to the west. To the north lies the well contained, Category 'A' listed building of special architectural or historic interest, Liberton House, set within wooded grounds. The site is bounded to the south by Stanedykehead. The site is well served by nearby Cameron Toll Shopping Centre and has regular bus services to the city centre located nearby.

The site's position within the existing city boundary and its moderate size allows for a short term 2-3 year deliverable residential site.

The Special Landscape Area and the low density development at Liberton can mutually co-exist. A small part of the site is proposed for development (2.98Ha) with the balance remaining as open space (5.44Ha). It is considered that the development will not adversely impact the aims or objectives of this policy of the City Plan.

## **Site 26. Calderwood**

Stirling Developments Ltd. (0303)

The inclusion of additional greenfield sites should be considered as part of a holistic plan for West Edinburgh. Within the 36 areas of the Place Policies section, 17 have a requirement for a master plan / place brief etc which suggests that they will not be able to come forward for development early in the plan period. CEC must therefore consider existing, effective sites that already have masterplans and briefs that can be extended. Calderwood is a good opportunity to deliver homes, of both tenures, early in the plan period.

There needs to be an ongoing, independent, rigorous review of the housing land supply throughout the plan period. Effective greenfield sites, such as Calderwood which is supported by the City Region Deal, are already delivering the key points of this policy and is capable of supporting City Plan 2030 early in the plan period, unlike many brownfield sites.

IBG – Plan allocates 7000 units on what appears to be a greenfield site that was not identified through the Choices document.

The plan needs to offer flexibility to support effective greenfield sites should the supported brownfield sites fail to deliver. Sites like Calderwood, which was identified in Choices is further supported by the City Deal and NPF4. Effective sites like Calderwood should be supported within City Plan as Calderwood has the ability to deliver homes of all tenures in a 20 minute neighbourhood with the requisite green blue infrastructure. Furthermore, Calderwood has a new exemplar primary school that already covers much of the allocation considered in the Choices document. With infrastructure already in place, the established Calderwood development can deliver units early in the plan period when brownfield sites are likely to struggle.

Approximately one third of sites proposed have less than a 50 unit capacity - too few to meaningfully support the plan. Brownfield sites are unlikely to deliver units until the end of the plan period, if at all. Cross referencing the housing sites in Table 2 with the Housing paper that supported the MIR suggests that very few of the new sites that are identified are noted as vacant.

The plan needs to allow flexibility for effective greenfield sites, like Calderwood to support the delivery of housing of all tenures.

Effective greenfield sites, like Calderwood, which was identified by CEC through their Choices document should be included in Plan.

#### Jupiter Artland (0257)

Support the exclusion of Area 5 Calderwood and the protection of Jupiter Artland and its countryside setting.

For the reasons as set out within the Committee Report to The City of Edinburgh Planning Committee on Wednesday 29th September 2021 the Council determined to exclude Area 5 Calderwood from the proposed City Plan 2030. Jupiter Artland welcomes and support this decision.

As detailed in the response to the Choices Paper in 2020 the landscape setting of the site remains of critical importance to the operation and function of the sculpture park. The allocation of the housing development in Area 5 would have adversely affected this landscape setting and impacted upon the potential for the sculpture park to draw investment and grow its cultural significance.

The exclusion of Calderwood will allow the business to revisit planned investment options and Jupiter Artland has received a wealth of support from artists and contributors as detailed within the supporting document. Jupiter Artland can now look towards the future with plans to introduce additional installations and facilities which will continue to improve and develop Jupiter Artland as cultural asset for the City of Edinburgh and Scotland.

Welcome the opportunity to respond to the Proposed Plan (consultation) and support the allocation of land at Jupiter Artland and its immediate surroundings as countryside. We would request that this position is noted and that we are kept informed of future stages in the Development Plan process.

#### **Site 27. North of West Craigs**

##### West Craigs Ltd. & Dunedin Canmore (0352)

The City Plan Spatial Strategy is overly reliant on brownfield land in existing business/industrial use. The strategy is unrealistic, high-risk and will fail to address housing need and demand during the City Plan period. To enable a sufficient volume and range of homes to be built an alternative strategy should be adopted and must make provision for housing development on both greenfield and brownfield land i.e. a blended approach. In support of this, land at West Craigs North represents an appropriate candidate for green belt release and re-allocation for housing led development.

The release of greenfield land for development can be identified and planned in a manner that would support the key aims of City Plan 2030 – including the aim of delivering a network of 20-minute walkable neighbourhoods and embedding a ‘place-based’ approach to the creation of high quality, high density, mixed-use and walkable communities, linked



by better active travel and public transport infrastructure, green and blue networks and bringing community services closer to homes.

West Craigs North can achieve all of these aspirations and represents an appropriate candidate for green belt release. West Craigs North offers a sustainable settlement expansion opportunity with the 20-minute neighbourhood principle at its heart. In support of Edinburgh's housing needs West Craigs North can make an important contribution to the delivery of new homes, both market and affordable, and play a significant role in helping Edinburgh meet its housing targets during the City Plan period.

West Craigs North is a gap site within the West Edinburgh Strategic Development Area – recognised as a sustainable location and a focus for the region's growth. The site's immediate surroundings are undergoing fundamental change as a result of strategic-scale residential development and associated infrastructure.

Development at West Craigs North will consolidate West Edinburgh's emerging settlement pattern without undermining the aims, objectives, purpose or integrity of the Green Belt at this location. West Craigs North will afford West Edinburgh an improved, robust and defensible Green Belt boundary defined by Cammo Estate to the north and Turnhouse Golf Club to the west of the site.

West Craigs North benefits from a highly accessible location: education, employment, commercial, retail, recreation and health facilities are all accessible via active travel or public transport in accordance with the principles of the '20 Minute Neighbourhood' concept and current guidance including Planning Advice Note 75 'Planning for Transport'.

West Craigs North represents an effective and deliverable site having been shown to be free of the seven specified constraints identified by Planning Advice Note 2/2010 Affordable Housing & Housing Land Audits.

Development at West Craigs North would meet the definition of 'sustainable development' when assessed against the thirteen principles of sustainable development identified by Scottish Planning Policy.

West Craigs North offers an opportunity to develop up to 500 homes, designed to integrate with and create a natural extension to the settlement. A choice and range of housing will be provided and, in partnership with Dunedin Canmore Housing Association, a commitment to the delivery of 50% on-site affordable provision has been made.

Overall, West Craigs North is ideally positioned to make a significant contribution towards City Plan 2030 meeting its housing targets and delivering the volume and range of homes required to address housing need and demand during the City Plan period.

West Craigs Ltd object to the inclusion of land at West Craigs North within the greenbelt, it is requested that the Proposals Map be amended to identify West Craigs North as a new housing proposal.

SESplan SDP Policy 7 makes provision for greenfield housing development proposals within or outwith identified Strategic Development Areas to be allocated in Local

Development Plans subject to satisfying a number of criterion. Development at West Craigs North can progress in accordance with SESplan SDP Policy 7 principles.

Development at West Craigs North will be in keeping with the character of the settlement and will not undermine green belt objectives.

West Craigs North makes no significant contribution to wider green belt objectives, as a result of existing and emerging development there is no longer a functioning green belt at this location.

Development at West Craigs North will consolidate West Edinburgh's emerging settlement pattern without undermining the aims, objectives, purpose or integrity of the Green Belt. The site's development will afford West Edinburgh an improved, robust and defensible Green Belt boundary defined by Cammo Estate to the north and Turnhouse Golf Club to the west of the site.

The site is 'effective' and free of any infrastructure constraints. Given the availability of existing infrastructure, development at West Craigs North is in accordance with the City Plan's 'infrastructure first' approach for new developments.

SESplan SDP Policy 12 (Green Belts) defines the purpose of Edinburgh's green belt. Development at West Craigs North would accord with the identity and character of the settlement, it would not result in coalescence. The site occupies a sustainable location at the settlement edge and its development will consolidate the settlement pattern and allow a revised defensible greenbelt boundary to be formed.

In terms of directing development to the "most appropriate locations", as above, the site represents a gap site at the heart of the West Edinburgh Strategic Development Area. The site could scarcely be better placed given its high level of accessibility to the pedestrian and cycle network, and public transport infrastructure. The submitted Accessibility Appraisal has highlighted that the site is within easy walking distance of local convenience services and clearly demonstrates how the Currievale site supports the 20-minute neighbourhood concept.

Planning Advice Note (PAN) 75 'Planning for Transport' states that 'A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour' for accessibility to local facilities by walking and cycling'. All key local facilities are situated within 1,600m from the site.

Existing topography, established and emerging developments to the immediate north, east and south allied to the adoption of a sensitive design approach and appropriate mitigation measures will ensure development at West Craigs North will maintain the identity, character and landscape setting of the settlement.

At present the site contributes poorly in terms of providing access to open space and the countryside there is no formal access across the fields of the site and access is typically restricted to field boundaries.

As evidenced by the West Craigs North Masterplan development will provide a range of measures that will significantly enhance opportunities to access open space and the countryside, including the delivery of large areas of open space and local parks within the

site itself, and the creation of an extensive path network across the site including connections with the Cammo Walk Active Travel Route and beyond to the nearby Cammo Estate.

## **Site 28. Cammo Fields**

### Dunedin Canmore HA (0766)

The Cammo Fields site is an opportunity to provide a 100% affordable housing development which is deliverable now. The proposals integrate within a location where other housing development is being progressed, with the right infrastructure already in place to ensure it would be a resilient and connected place.

Proposal is for 100% affordable housing scheme on the site, with design layout and technical reporting at an advanced stage. The proposals are considered to respond positively to the key planning policy drivers in the emerging City Plan 2030, as well as other relevant material considerations including draft national planning policy. The accompanying design document supplements this planning representation.

The Cammo Fields site is located on the western edge of Edinburgh with access from the A902 Maybury Road which runs between Queensferry Road to the north and the A8 Glasgow Road to the south. Land to the east of the Maybury Road is predominantly residential in nature and land to the west is predominantly undeveloped as it forms part of the Green Belt. The site is bounded by Cammo Walk to the west and Maybury Road to the east. Pedestrian and cyclist access can be taken from Cammo Walk and vehicular access from Maybury Road.

The site is owned by the Scottish Government and is noted as having been surplus to their requirements for several years.

The site comprises an area of approximately 5 hectares and the site is roughly triangular. Scottish Government have noted that the site contains no significant landscape features of note, and there are no historic records of mineral workings or mining. The risk of contamination is negligible, and there are no infrastructure constraints. Water supply, drainage, education capacity, electricity and telecoms are all either available or can be made available.

The site is currently located within the green belt, however, it is also on the urban edge of the city, surrounded by other residential development.

West Edinburgh is the subject of significant development focus and change. The site is in proximity to several application sites for major residential-led development, most notably the designated HSG 20 site to the north (currently being developed by CALA and David Wilson Homes) and the HSG 19 site to the south (now reallocated in the City Plan) with infrastructure works underway and the development being carried out by Taylor Wimpey.

The Scottish Government previously submitted representations to the Main Issues Report stage and sought to promote the site for residential development.

The Scottish Ministers own the site and Scottish Government Estates support and have put into place an agreement in principle to transfer the land to Dunedin Canmore Housing

on the basis of a 100% affordable housing site. This is in recognising the need to release land to achieve the wider public policy goal of delivering more affordable housing.

The site is in a prime position to deliver much needed affordable housing now and can be delivered in a holistic way that provides improved access to the greenbelt for recreational purposes for all.

It is important to note that the approach set out in this representation is reflective, and indeed is supported, by the emerging Scottish Government position in National Planning Framework 4 which includes support for affordable housing where it is needed.

The opportunity at Cammo Fields very much reflects the 20-minute neighbourhood concept. The site is strategically placed adjacent to the existing Maybury Road and will be able to utilise existing transport, active travel, and infrastructure opportunities. It can connect into existing cycle networks and indeed provides the opportunity to create better linkages. The site is easily accessible to community facilities, both existing and proposed, and to green space and countryside on foot. The development of the site and associated connectivity can serve to act as a gateway into the wider countryside and recreation facilities to the west, including the Cammo Estate.

The Cammo Fields site to be supportive of the 'infrastructure first' this in that new development is directed to existing infrastructure. The proposals if for an exemplar development from a sustainability and urban design perspective. The architects are currently developing a sustainability strategy based on Passive House design standards to contribute positively to the goal of net zero for Edinburgh. By adopting a 'Designing Streets' approach to the design this will help create a high-quality urban neighbourhood. This directly supports the Council's aim to become net zero by 2030 and to be more resilient to climate change.

The site at Cammo Fields proposes to use an area of greenbelt which currently does not add value or actively contribute to the wider area. Does not consider that all development should be directed to brownfield land rather than greenfield, instead an opportunistic approach should be taken. A number of brownfield sites within the Plan have been allocated however are either heavily constrained or not available in the long term. The site at Cammo Fields, whilst currently in the greenbelt, is a small parcel of land that can be delivered now for the immediate supply of much needed affordable homes for the city. This provision meets CEC's aim of delivering land to meet Edinburgh's housing needs over the next decade.

The boundary of the green belt shown on the Proposals map remains largely unchanged from previous local plans. Taking into account the above purposes of the greenbelt, our client considers that the release of the small parcel of land at Cammo Fields can be seen positively as a new more logical boundary to be created.

Discussions with CEC Transportation resulted in a positive response to the proposed access route into the site from Maybury Road and the opportunity to form a new junction which will help Maybury Road become a more urban traffic road, rather than having the current feel of a continuation of the bypass.

The development would integrate well with the proposed new 'Green Corridor' Active Travel route at Cammo Walk where the intention is that this will be a fully lit and safe cycle

/ pedestrian route. There is a clear opportunity to link into this by ensuring walking and cycling are very much at the heart of the development at Cammo Fields. We note that a request for an EIA screening opinion (Ref: 21/02306/SCR) was submitted in November 2021 and that the active travel route is also proposed to be delivered within the live planning application for nearby West Craigs.

Whilst Cammo Fields is currently designated as green belt, the site in its current use does not contribute positively to the greenbelt environment and is not currently accessible for recreational use. It instead creates a physical barrier to pedestrians and cyclists trying to link in from the east through to the Cammo Estate in the west. The proposed development has the potential to remove this blockage and encourage pedestrian and cycle movements. This will open up access to the proposed new cycle route from Maybury (South Gyle) through to Cammo and beyond whilst also improving access to the high-quality recreational opportunities of Cammo Estate.

The site is not considered to be a good contributor to the green belt at present, and as identified within the LDP Proposals Map it is on the very edge of the urban area, and soon to be enclosed on most sides by development. The site could instead be considered to act more as a gateway to the Cammo Estate opening up better access to open space and recreation for the local community and acting as a community transition into the more valued and actively used areas of greenspace. A bespoke housing development focusing on landscape and recreation in this location would act as a much improved boundary to the greenbelt, and in doing so provide a more suitable frontage to Maybury Road in line with other developments.

The site could contribute to delivering an integrated community and appears to be a logical extension to other housing development within the area, and in doing so enhancing affordable housing delivery.

The CEC Housing Team are supportive of high quality, sustainable housing developments that deliver above policy levels of affordable housing. The Council's support for the delivery of affordable housing in Edinburgh is well-documented and the delivery of affordable homes is at the heart of the new LDP and a topical issue throughout the city. This is in response to the stark affordable housing need manifesting across Edinburgh.

Analysis of affordable lettings data for West Craigs and neighbouring Corstorphine / Murrayfield identifies this issue is particularly acute in these letting areas, where in the past year there was one social rent property advertised in East Craig and eight properties advertised in neighbouring Corstorphine / Saughtonhall. Affordable housing stock numbers are very low in both these wards, with 457 (or 5%) of the total East Craig stock being affordable and only 332 (or 3%) in total in Corstorphine / Saughtonhall.

The site at Cammo Fields provides the opportunity to establish an exemplar development, with a unique approach which would allow client control and design freedom, unlike other residential schemes where the affordable housing element is provided alongside other house builders. The site is deliverable with well advanced proposals and background technical information is available. With our client clearly keen to pursue, this is an important opportunity to deliver 100% affordable housing.

The developer is open to a discussion with the Council on the affordable tenures to be provided, with a mix of Social Rent, Mid-Market Rent and also Shared Equity being

delivered to assist with the purchase of affordable homes for those on low to moderate incomes. Affordability pressures across the city and particularly in the local area, means that home ownership is out of reach of the majority.

Edinburgh therefore needs more homes to meet housing need and support economic growth, and smaller opportunities such as at Cammo Fields can supplement this approach. The proposed mix and tenure will be bespoke to the local area, and will also provide specialist, or housing for older people, if local demand shows a need for this type of housing.

In 2017, the Council made a commitment to developing a programme to deliver at least 10,000 social and affordable homes over the next five years, with a plan to build 20,000 by 2027. The affordable housing supply target set out will meet the Council Commitment in full and acknowledges that affordable housing will continue to be delivered beyond 2027. It takes account of the constraints on delivery of affordable housing and the reliance on market housing to provide affordable housing.

The developer would look to work with one of the main car club providers in the area or directly to deliver a pool of cars that would allow customers to make the decision to live car free. The developer is proposing a lower number of parking spaces and an expansion of city car club spaces, with links to electric vehicle charging stations.

By having full control of the development of the site, the developer is proposing an exemplar development from a sustainability and urban design perspective. The architects are currently developing a sustainability strategy, including a significant reduction in carbon emissions from material selection, to contribute positively to the goal of net zero carbon for Edinburgh.

The developer is committed to maximising community benefits for their customers and communities through their procurement activities. The providers will include community benefit clauses in new house building contracts, to deliver wider social benefits in addition to the house building contract. These clauses can be used to provide local facilities, training opportunities, or spend money locally in other ways, in conjunction with the existing local community.

Within the Plan, Place 22 Maybury is designated as an area for development, and which lies in close proximity to the site at Cammo Fields.

This housing site was allocated for development and removed from the green belt in the Edinburgh Local Development Plan (2016). The allocation suggests that comprehensive master planning and phasing of development will be required drawing upon placemaking and street design principles to create distinctive and sustainable urban communities at the gateway to the City.

A new 30m wide green network link is to be provided from a new pedestrian / cycle bridge through the Maybury site to connect via Cammo Walk and Cammo Estate Park to the north. This will provide a new, strategic, north-south green network link to the west of the city. No vehicular access should be taken through the green corridor.

Policy Place 22 Maybury overlays the Cammo Fields site, and also includes the HSG 20 housing site which is currently under construction. The site at Cammo Fields would be a

logical addition for a bespoke affordable housing development, which could link in effectively with the proposed allocation at Maybury, including its new active travel route. The site at Cammo Fields can help to deliver a better gateway to the Cammo Estate.

Policy Env 18 Development in the Green Belt and Countryside states that within the Green Belt and Countryside shown on the Proposals Map, development must meet one of the given criteria and not detract from the rural environment or landscape of the surrounding area in terms of its quality, characteristics, and views.

The Cammo Fields site can be developed without compromising the landscape setting and indeed can support and enhance opportunities for countryside recreation. The Cammo Fields site, being on the boundary of the urban area, could form a logical release from the greenbelt. Other housing developments in the area have changed the nature of this greenbelt / urban edge boundary leaving the Cammo Fields site as a standalone triangular portion of land which is not contributing to the wider greenbelt designation. The site is bounded by the proposed active travel route of Cammo Walk and there are opportunities to strengthen this through development of our client's site.

There needs to be a greater focus on deliverability to ensure that housing needs are met within the City Plan 2030, particularly affordable housing provision. As evidenced throughout this representation, there is an acute need for homes across the city, and the affordable housing stock numbers are particularly low in both East Craig and Corstorphine / Saughtonhall wards. There is clearly unmet demand for product in West Edinburgh.

The proposed City Plan 2030 introduces an approach to housing policy in seeking to maximise the use of brownfield land rather than greenfield. It is recognised that many of the identified brownfield housing land opportunities are currently in active alternative use and with no immediate prospect of conversion to housing. To ensure deliverability, and to meet the expected housing requirements throughout the lifetime of the plan, there needs to be allowances for others site to come forward. Our client's site at Cammo Fields can deliver much needed affordable housing now.

## **Site 29. Land at Burdiehouse**

### Hallam Land (0457)

Allocate land at Burdiehouse for a housing site for c.11 units. Ultimately, as demonstrated through the responses to other sections of City Plan 2030, it is considered that if the Council continue to pursue a brownfield strategy without consideration of identifying additional greenfield sites for release, it could inhibit the delivery of market housing and could result in a potentially significant shortfall within the Plan period.

The site is deliverable / effective, with a developer who is committed to developing the site within the Plan period. In technical terms, there are no site constraints which are insurmountable and any remaining matters in relation to technical constraints can, and will, be addressed at a later stage where Hallam recognise the need to undertake additional surveys.

In summary:

- The site is considered to have potential to deliver on the 20-minute neighbourhood concept (advocated within NPF4) whilst also delivering new, high quality and energy

efficient homes in Edinburgh, providing a logical extension to Burdiehouse Phase 3 and completing development on the south eastern edge of Edinburgh. The site is located within a 20-minute walking distance (800m) of a large number of services including those associated with Straiton Retail Park (including a supermarket and a range of other retail stores), Frogston Primary School, South House Children & Young People's Centre and Valley Community Centre. In addition to the broad range of services accessible within 800m walking distance of the site, slightly further afield, Pentland Industrial Estate, Bilston Glen Industrial Estate, Eldin Industrial Estate and Edgefield Industrial Estate, all of which are less than a 10m bus ride to the south west of the site;

- A well designed and well-connected sustainable addition to Burdiehouse Phase 3 could be provided through the utilisation of high quality placemaking, design and delivery (as demonstrated through the Concept Masterplan. The allocation of this site for housing in the City Plan 2030 would introduce a new robust and well landscaped settlement edge to the south of the site and provide a large new area of informal open space. The allocation of this site in the City Plan 2030 would provide a logical extension to the existing development to the north and complete development on this site, which is recognised by CEC as suitable for development;
- The site can form a robust, defensible green belt boundary and has potential to introduce a substantial new area of open space to the north of the proposed development, which would link in with the green network, connect with the existing path network and provide an extension to the area of open space located in the south west corner of the Burdiehouse Phase 3 development under construction by Barratt Homes; and
- The proposed development would also improve the provision of accessible open space for both existing and new residents, as the current agricultural land would be replaced with a large new area of informal open space, comprising roughly two thirds of the overall site area.

Should the Council continue to pursue a brownfield only strategy, they risk a significant housing land shortfall within the Plan period. Changes would be required to identify further greenfield housing sites to supplement the brownfield land identified through the Plan.

Disagree with the omission of the site at Burdiehouse Road, Edinburgh, which is considered to be a sustainable and effective site, capable of delivery within the Plan period. The site is located within walking distance of a number of services including those associated with Straiton Retail Park (including a supermarket and a range of other retail stores), Frogston Primary School, South House Children & Young People's Centre and Valley Community Centre. The site is also well situated in terms of transportation access with Burdiehouse Village bus stops within 400m walking distance with a range of bus routes including an express bus to Edinburgh City Centre. The site has the potential to be served by a new rapid bus transit, tram and cycle route to enhance the existing public transport corridor and bus link. CEC has a vision for South East Edinburgh to be a sustainable mixed-use neighbourhood that combines residential, employment commercial and community uses which are easily accessible by public transport.

The site is therefore clearly accessible and in a location which offers a choice of sustainable active travel and public transport options to minimise the need for travel via unsustainable sources.

A greenfield site assessment was completed by CEC for the land east of Burdiehouse Road and there are no identified areas of flood risk within SEPAs indicative flood risk maps. It is recognised there will be some impact on the existing green infrastructure.



However, the site is currently inaccessible to the public so opportunities to improve open space, landscaping and/or green network infrastructure could facilitate increased connectivity to green / open space and help deliver green network enhancements within this area.

In this regard, it is considered this site is well placed to deliver a vibrant and sustainable new housing development which meets the 20-minute neighbourhood aspirations set out through NPF4, which are reflected in the aims of the Proposed LDP2 (Aim 2 pg. 8).

In terms of effectiveness, the site is available for development, and construction could therefore commence comfortably within the short term. Crucially, the site benefits from being the potential final phase (Phase 4) of the Burdiehouse housing project which could allow for development to be continued from the earlier (and adjacent) Burdiehouse phase to this phase without any significant constraints.

### **Site 30. Land at Burdiehouse Rd**

#### Azad Murdochy (0361)

The site at Burdiehouse can meet several of the City Plan 2030 Aims as prescribed in the Proposed Plan document namely;

#### **Aim 1**

The site can add further place making and neighbourhood complementary with the significant number of new homes recently constructed at Burdiehouse adjacent to this vacant site. When proposed as an integral part of the “20-minute walkable neighbourhood” concept, the vacant land can further enhance and improve the visual and residential amenity of the surrounding local area and provide a sense of place.

#### **Aim 2**

The vacant site is previously used, but has become overgrown through lack of development constrained by current planning policy. Therefore as a brownfield site, the proposal can respond to Aim 2 by helping to re-image the neighbourhood.

#### **Aim 4**

Any proposed new housing, such as for affordable or special needs, proposed for the vacant site, would be targeting net-zero in terms of operational emissions and use of building materials.

#### **Aim 6**

The proposal for the vacant land could be for affordable housing as outlined in the Choices consultation. It is therefore highly likely the site will contribute 100% of the housing to affordable needs, meeting and exceeding the Council’s progressive minimum 35% affordable housing target in the City Plan 2030.

#### **Aim 7**

The proposed vacant land use for affordable housing would provide a compatible land use to the surrounding residential area, and at the same time, significantly improve the visual and residential amenity through better place making rather than its current vacant condition.

#### Aim 8

There is new and recently commissioned infrastructure in the surrounding area into which the proposed development site can be connected meaning the site can match the “infrastructure first” approach aimed for by the Council.

As a proposed affordable housing site, the plans would encourage use and connectivity to this existing infrastructure by restricting car dependency or reducing car parking needs to encourage affordable living within the Plan’s Aim1 for a 20-minute walkable neighbourhood and Aim6 for a higher proportion of affordable housing provision in the location.

Object to the continued designation of the proposal site under Proposed Plan Env 21 (Protection of Biodiversity) as a Local Nature Conservation Site.

We recognise the proposal site is currently designated in the adopted Local Development Plan under Policy ENV15 (Sites of Local Importance). Historical development proposals for the vacant site were deemed to be constrained under Policy ENV18 (Open Space Protection) as a consequence. Therefore, current policy framework effectively means the planning authority views the subject site to be protected from development as it forms part of a wider Local Nature Conservation Site and is protected open space which allegedly contributes to amenity of the surrounding area.

The Proposed Plan continues to show the vacant land promoted as being designated a Local Conservation Site under Policy Env 21 Protection of Biodiversity. However, it is understood the proposed development of the vacant land can be supported by the new Policy Env 23 (Protection of Open Space Protection) where it allows development for exceptions criteria, along with Policy Hou 2 (Affordable Housing) where the proposal would provide a community benefit which would arguably over-ride the weight that could be attached to the relevance of Policy Env 21.

Policy Env 21 itself provides that development can be supported, under criteria c) which states it would make exception “For Local Nature Conservation Sites and Local Nature Reserves where adverse effects are adequately offset to maintain the integrity of the interests affected and the involvement of people.”

The shift in sentiment within the Proposed Policy Env 23, coupled with the above Proposed Plan Aims and key strategy targets for generating “20 minute walkable neighbourhoods” and to provide minimum 35% affordable housing suggests that the vacant land promoted in this submission can offer the Council a small, but significant contribution to the Proposed City Plan 2030 and aligns well with the emerging policy direction in which the Council prefers to take land use planning for the City.

The landowner warmly supports policy Env 23 wording and understands that were a proposal for affordable housing, for the vacant land promoted, then it is our view that it can be suitably demonstrated and justified that such a development would not be contrary to the new Policy. As such, the landowner supports this Policy.

Support Policy Env 21 (Protection of Biodiversity), noting that Criteria c) of the Policy provides for exceptions to any development of a Local Nature Conservation Site where the adverse effects are adequately offset. In the specific case here, this is a small and outlying corner of the wider Local Nature Conservation Site, which lies adjacent to an existing

'balancing pond' associated with nearby large-scale housing development and not in the larger identified green corridor associated with Burdiehouse Burn (which does provide the environment and circumstances for protection of a Local Nature Conservation Site). The proposal for affordable housing would on balance, not cause adverse effects on the small outlying corner of the Local Nature Conservation Site, and the proposal for affordable housing would itself offer a community benefit which City Plan 2030 is seeking to meet in its development strategy Aims to provide a significant increase in affordable housing provision in the plan period. The development can provide 100% of the needs on this site, which well exceeds the minimum 35% affordable housing contribution proposed in Proposed Plan Policy Hou 2.

It is recognised that the site is currently designated in the adopted LDP under Policy ENV15 (Sites of Local Importance). Historical development proposals for the vacant site were deemed to be constrained under Policy ENV18 (Open Space Protection) as a consequence. Therefore, current policy framework effectively means the planning authority views the subject site to be protected from development as it forms part of a wider Local Nature Conservation Site and is protected open space which allegedly contributes to amenity of the surrounding area.

The Proposals Map of the City Plan 2030 Proposed Plan continues to show the vacant land promoted as being designated a Local Conservation Site under Policy Env 21 Protection of Biodiversity. However, it is understood the proposed development of the vacant land can be supported by the new Policy Env 23 (Protection of Open Space Protection) where it allows development for exceptions criteria, along with Policy Hou 2 (Affordable Housing) where the proposal would provide a community benefit which would arguably over-ride the weight that could be attached to the relevance of Policy Env 21.

Policy Env 21 itself provides that development can be supported, under criteria c) which states it would make exception "For Local Nature Conservation Sites and Local Nature Reserves where adverse effects are adequately offset to maintain the integrity of the interests affected and the involvement of people."

Supports Proposed Plan Policy Env 23 noting that the Policy allows loss of open space where it can be demonstrated that there will be a local benefit proportionate to the scale of the development. The proposed affordable housing development of this vacant site will provide a local benefit that outweighs the protection of the small area of open space; particularly where the adjacent remaining open space proportionately provides a more cohesive and rational biodiversity area which will enhance the surroundings in all cases.

The vacant site could provide 100% affordable housing, thus exceeding the Council's ambitions, albeit from a modest sized site. Given the positive Policy Env 23 support for re-development of open space sites where the proposal can be justified against that policy's criteria, then the landowner supports Policy Hou 2, as it is recognised provision of more than 35% - such as the proposal for 100% affordable homes, would be "a development for a community purpose and would have an overriding benefit to the local community and public that outweighs the loss of open space" as read from Policy Env 23. The affordable housing would also need to meet the terms of other detailed criteria in Policy Env 23 along with other policies as relevant. However the principles within Policy Hou 2 and Policy Env 23 are satisfactory from the landowner's point of view.

It follows therefore, that subject to the proposed development of the vacant land for

affordable housing, it would meet Policy Env 23 and Policy Hou 2 along with the requirements as laid out in the City Plan 2030 Appendix D “Development Principles set out in Appendix D” to the City Plan.

Object to the continued designation of the proposal site under Proposed Plan Env 21 (Protection of Biodiversity) as a Local Nature Conservation Site.

### **Site 31. Hatton Village (Hatton Mains)**

#### Inverdunning (Hatton Mains) Ltd (0427)

Amend plan to identify new sustainable communities to include the proposed site at Hatton Village adjoining the A71 Strategic Active Travel Project. As noted by the Council in the Choices for City Plan (Main Issues Report) document, there are options for sustainable greenfield development. Whilst several of the options put forward as alternatives by the Council at that stage were not suitable in terms of scale and likely deliverability within the City Plan period, there are other options which have been put forward to the Council. The Inverdunning proposal for a new sustainable community at Hatton Village was outlined in representations to the Choices document which also provided an analysis of alternative greenfield locations at that time. There is need for the City Plan to incorporate suitable greenfield sites to allow for growth.

A summary of the case for Hatton Village and how it meets City Plan aspirations for 20 minute new neighbourhoods with strong public transport linkage is outlined in the supporting document.

Supporting Document has been prepared by Meinhardt in support of Hatton Village proposal. Key extracts are provided below.

The full representation, prepared by Pegasus Consultancy, sets out how Hatton Village, to the west of Edinburgh City Centre and accessed from the A71, will deliver a sustainable led community capable of meeting CEC housing targets and the ambition to create a more sustainable and fair city for all.

The proposed City Plan 2030 would act as CEC’s blueprint for the region over the next 10 years and seeks to meet and balance challenges around:

- sustaining environmental and climate health;
- accommodating anticipated population growth;
- affordable housing provision;
- delivery of sustainable communities;
- infrastructure provision, including community infrastructure;
- active and sustainable transport; and
- employment and economic land use needs.

Hatton Village has been designed with challenges in mind. The development adopts the 20-minute-neighbourhood approach emphasised within the proposed City Plan from the outset: Hatton Village will be a high quality, mixed use and mixed density, walkable community supported by active travel connections, public transport infrastructure, and diverse green and open spaces.

The development will incorporate a mix of dwelling types and include a significant portion of affordable housing. New residents will be provided the opportunity to easily travel to Edinburgh City Centre and other key destinations in a sustainable manner. Furthermore, Hatton Village's co-working facilities allow for a reduction in the need to travel by allowing residents a place to work, outside of their own home.

The development will also incorporate sport & recreation facilities, green space, a mobility hub and allotment garden space. A site has also been earmarked for possible health facilities and a primary school, delivered at year 5 of the anticipated 10-year development timeframe for Hatton Village. Figure 1 and Figure 2 identify the destinations accessible within 10 and 20-minutes walking and cycling distance. This is in line with the proposed CityPlans interpretation of the 20-minute-neighbourhood principle of a 20 minute round trip rather than 20 minutes each way.

Successful discussions have been held with Lothian Buses on maximising public transport uptake by future residents and enhanced bus services on the A71. The operator was supportive and very positive towards increasing the critical mass of passengers along this corridor to support their Lothian Country offering. Initial discussions have also been held with Dalmahoy Country Club around providing residents of Hatton Village and visitors to the country club with an EV shuttle service serving the airport and other West Edinburgh destinations.

A number of brownfield sites have been allocated in the proposed City Plan, particularly in West Edinburgh, which can be compared to the Hatton Village proposal.

Development of the Hatton Village site offers many traffic and transport benefits over competing sites identified within the proposed City Plan 2030. These include:

- Ability to move the critical mass and diffuse traffic impact across West Edinburgh.
- Connect to different employment, leisure and community areas, in particular, in West Lothian and in South East Edinburgh via orbital bus connections.
- Link in to and safeguard proposed Active Travel route on the A71.
- Strengthen existing public transport provision on the A71.

In addition, brownfield land with employment generating potential that benefits from proximity to the airport can be retained to respond to future needs. Residential development on the Hatton Village site would be in an area away from the airport with higher amenity, particularly with regard to setting, noise and congestion.

The Hatton Village proposals, for which a Transport Assessment was produced by AECOM in 2019, is shown to have very little impact on the A8 and Gogar Roundabout, where the transport interventions in the proposed CityPlan are focused. As such, there would be an opportunity to progress the site without such a reliance on the progression of significant offsite transport interventions.

The Hatton Village site is well suited to being progressed as a low car development, with a high sustainable travel mode share. This is exemplified by the accessibility of the site by public transport. Accessibility during the morning peak hour is for a typical 45-minute commute for both Hatton Village and for allocated brownfield sites in West Edinburgh. The central area of Edinburgh is covered within a 45-minute journey during the morning peak hour from both Hatton Village and West Edinburgh. However, from Hatton Village employment sites in West Lothian, including Livingston, are highly accessible. These areas are not accessible from the allocated West Edinburgh sites.

This connectivity and accessibility via public transport would only increase when future public transport improvements are implemented including enhanced services along the A71 delivered by Lothian Buses and subsidised by the Hatton Village developer, as well as improved orbital bus routes for Edinburgh.

The site proposed for Hatton Village is well aligned with the Transport Strategy outlined in the proposed City Plan and relevant policy documents:

- The developer's ambition is to create a sustainable community in line with vision for Edinburgh's future.
- This is supported by willingness to provide sustainable travel through potential funding of additional Lothian Bus Services following a promising initial consultation process with the operator. From these discussions it is understood there is currently a major 'viability issue' with delivering services in the A71/Ratho corridors and the proposed new village would 'plug' a gap in customer use between Edinburgh and Livingston and make existing and enhanced services significantly more viable in future.
- Alternatively or additionally, the provision of a shuttle bus connecting key locations such as Hermiston Gate Park and Ride, Dalmahoy Hotel and the airport to the site would also be considered.
- Development in this location would diffuse traffic away from Gogar Roundabout, Hermiston Gate and the A720 Edinburgh Bypass.
- Inclusion of a mobility hub, supporting bus transit, cycling, car sharing and electric vehicles, to support an increase in the proportion of trips people make by active and sustainable travel modes.
- The Homeworking Hub would support flexible working arrangements and allow less traffic to be on the road altogether, tying in with COVID-related / perceived new travel behaviours.
- The site accommodates a potential new primary school location, supporting fewer vehicle trips as pupils could walk or cycle to school.
- The A71 provides a suitable corridor for transit-oriented growth as described in Section

Furthermore, a series of uncertainties in relation to the proposed City Plan and its background supporting documents including the City Mobility Plan and accompanying Transport Assessment (prepared by Jacobs) have also been identified. These focus predominantly on uncertainties based on assumptions made to accommodate impacts on travel behaviours caused by the COVID-19 pandemic on the modelling work. In addition the reliance on brownfield sites within a planning scheme with a 10-year timeframe is also short-sighted, as discussed.

Based on the above, reconsideration to the allocation of the proposed site for Hatton Village in the City Plan 2030 is supported by transport and mobility grounds.

### **Site 32. New Liston Road, Kirkliston**

#### Robertson Residential Group (0537)

Request that site at New Liston Road, Kirkliston as a housing allocation with an indicative capacity of c.90 units.

As demonstrated through the responses to other sections of City Plan 2030, it is considered that if the Council continues to pursue a “brownfield only” strategy without consideration of identifying additional greenfield sites for release, it could inhibit the delivery of market housing and could result in a potentially significant shortfall within the Plan period.

The proposed site is deliverable / effective, with a developer - Robertson - who are fully committed to developing the site within the Plan period.

In technical terms, there are no site constraints which are insurmountable and any remaining matters in relation to technical constraints can, and will, be addressed at a later stage where Robertson recognise the need to undertake additional surveys.

In summary:

- The site can deliver on the 20-minute neighbourhood concept (advocated within draft NPF4) whilst also delivering new, high quality and energy efficient homes in Edinburgh, offering new and existing residents an increased choice of homes for those who want to live and work within the City. The site is located within a 20-minute walking distance (800m) of a large number of services including Kirkliston Primary School, Almond Group Medical Practice, Kirkliston Library, Main Street (which contains a community church, post office, pharmacy, convenience stores, veterinary practice, and a number of hot food takeaways). There are also a number of employment uses focused in the Newbridge area, which is c.600m to the south of the site. In addition to the broad range of employment accessible within 800m walking distance of the site, slightly further afield there are a range of employment options within 15m on public transport including RBS Headquarters at Gogarburn and Edinburgh Park;
- A well-designed and well-connected and sustainable southern extension to Kirkliston could be provided through the utilisation of high quality placemaking, design and delivery (as demonstrated through the Concept Masterplan). The allocation of this site for housing in the Plan would provide a robust and well-landscaped settlement edge with the M9 and the B800. The allocation of this site in the Plan would also, alongside the three proposed housing sites located to the north of Kirkliston, increase housing supply within this area;
- The site can offer a wide range of different housing types providing additional choice for people choosing to live and work in the west side of Edinburgh City;
- The site can form a robust, defensible green belt boundary (M9 motorway) and has potential to introduce a new, well landscaped proposal which retains large areas of open space which link in with the green network, wider path networks and introduces a comprehensive landscape framework to the site, as illustrated through the Concept Masterplan;
- The proposed development would also improve the provision of accessible open space for both existing and new residents, as the current agricultural land would be replaced with a variety of green spaces, which could include habitat-rich green space, green corridors providing linkages for wildlife and provision of play facilities (or contribution towards enhancing the existing play facilities located c. 20m to the north and east of the site beyond the River Almond); and

- The site is located within Kirkliston, a desirable location in a strong market area, with proven demand for family housing. It has a strong track record of housing delivery with the majority of the north part of the town being delivered over the past decade.

The site is considered to be a sustainable and effective site, capable of delivery within the Plan period. The site is located within walking distance of Kirkliston town centre. It also has good access to sustainable transport options with access to bus stops within Gateside Road and Milrig Cottages - which are both comfortable within 400m walking distance and provide regular bus services connecting the site to Edinburgh, Balerno and Livingston as well as Dunfermline, Arnothill and Queensferry.

The site does not fall within any heritage designations. The site is in close proximity to a number of services, employment and Kirkliston's town centre and presents a clear opportunity to deliver housing which conforms with the 20-minute neighbourhood principle. In addition, it will be situated within close proximity to an area designated by CEC as employment land - further strengthening the site's sustainability credentials and CEC's aspirations to create mixed use communities that can discourage trips by private car etc.

The site is therefore clearly accessible and in a location which offers a choice of sustainable active travel and public transport options to minimise the need for travel via unsustainable sources.

SEPA indicative flood maps show part of the site is at medium-high risk of flooding and therefore the design will provide suitable mitigation measures for this part of the site including avoiding housing within this area. It is recognised there will be some impact on the existing green infrastructure. However, the site is currently inaccessible to the public so opportunities to improve open space, landscaping and/or green network infrastructure can facilitate increased connectivity to green / open space and help deliver green network enhancements within this area.

In this regard, it is considered this site is well placed to deliver a vibrant and sustainable new housing development which meets the 20-minute neighbourhood aspirations set out through NPF4, and which are reflected in the aims of the Proposed LDP2 (Aim 2 pg. 8).

Following on from the responses presented to other sections of City Plan 2030, it is clear that should the Council continue to pursue a brownfield only strategy, it risks a significant housing land shortfall within the Plan period and therefore are not fulfilling their obligations with regards to the provision of an adequate supply of new homes across the CEC area. On this basis further greenfield housing sites to supplement the brownfield land identified through the Plan are required specifically New Liston Road housing allocation.

### **Site 33. Norton Park**

Taylor Wimpey and Hallam Land (0603)

The safeguard for the possible relocation of the RHC should be removed from City Plan 2030.

Within the supporting text of Place Policy 20 and on the proposals maps, the site at Norton Park has remained safeguarded for the potential relocation of the Royal Highland Centre.



Under Choice 14 (B) in the Choices for City Plan 2030 document, the Council proposed to remove the safeguard on the site to allocate it for other uses. The Council has chosen to retain the existing LDP allocation to safeguard the site despite the evidence showing that this is highly unlikely to be required, particularly within the context of the climate emergency and the shift to net zero carbon, and unnecessarily constrains a site which is capable of meet housing need and demand in a highly sustainable manner.

The reasons given in the supporting text is that it has been safeguarded in accordance with NPF3. This is also reflected in the Council's assessment of the Norton Park site which, whilst concluding it was suitable for development, stated "This land is still safeguarded for a potential relocation of the Royal Highland Showground and any allocation for development here would be on the condition of the removal of this constraint.". Since the Proposed Plan was published for consultation, the Scottish Government has published the draft NPF4 which changes the national policy direction for the site. NPF4 is seeking to remove Airport Enhancements, including the Edinburgh Airport Expansion, from its list of National Developments. As such, this would remove the national policy constraint requiring the land at Norton Park to be safeguarded for the potential relocation of the Royal Highland Centre. Therefore, it would be up to the Council to decide whether the site should continue to be safeguarded, constraining sustainable and inclusive growth in anticipation of growth in air travel, or be allocated for other more sustainable uses.

The original driver for the showground safeguard was the Edinburgh Airport Masterplan of 2006 which was prepared pursuant to the UK Government White Paper - Future of Air Transport 2003 which specified that the Aerodrome Safeguarding process should be used to protect land, outside existing airports, needed for future expansion against incompatible development in the intervening period. This drove the preparation of masterplans for all UK airports, including Edinburgh, which ultimately resulted in the identification of land for a second runway at Edinburgh Airport, its associated growth, and the need for the relocation of the showground. However, Edinburgh Airport Masterplan states 'this safeguarding is a long term precaution only, as we believe that the future growth of the airport can be sustained by the current main runway only'. What can be questioned is the need for the potential scale of the related land take to the south of the terminal complex given the substantial area of land now available to the airport within the Crosswind Ltd land holding, Crosswind Ltd being an off-shoot of Edinburgh Airport Ltd.

In the meantime, there continues to be a need to provide new housing and other uses on a significant scale to serve the city and city region. The current safeguarding of land at Norton for the possible relocation of the RHC constrains a site with clear potential for a more intensive and practical use within the city region. In 2019, The Royal Highland and Agricultural Society of Scotland (RHASS) invested £4.8m in an event facility on their current site to greatly enhance the venue in the years ahead; this could be interpreted as an apparent statement of intent by the RHASS to remain on their current site. It is, however, recognised that before the land can be released for development, the future of the RHC in its current location must be secured. Therefore, TW/HL support a strategy for growth which allows for future land use changes at both the airport, including Crosswind, and RHC, whilst maximising the strategic advantages that the land at Norton offers as a new and vibrant, inclusive and sustainable mixed use neighbourhood. Therefore, given the above, the safeguard for the possible relocation of the RHC should be removed from

City Plan 2030 to provide the opportunity to deliver a sustainable residential-led mixed-use development which would help meet housing need and demand.

TW/HL are supportive of development where it provides good quality, usable open space and private gardens to meet the needs of future residents. There are multiple studies which have shown that spending time in a private garden is linked to many health and well-being benefits. Benefits include an increase of physical exercise as well as improvements in perceived stress.

The evidence on the benefits open space/greenspace provision in developments can have on physical and mental health and well-being is also well documented. Access to greenspaces can improve sleep and reduce stress, increase happiness and reduce negative emotions. The significant health benefits greenspace can have on children's physical, mental and social development from infancy into adulthood has also been made clear in Unicef's Discussion Paper 'The Necessity of Urban Green Space for Children's Optimal Development'.

The site at Norton Park could offer a range of accommodation of varying house types which would provide private gardens and significant areas of greenspace. The site would be able to deliver a varied and dynamic green infrastructure network consisting of formal areas of public open space with opportunities for children's play and sport alongside more naturalistic landscapes which can accommodate other forms of active recreation. Urban parklands establish two of the green corridors through the site. These would consist of managed, contemporary, high quality areas of public open space support formal sport and play opportunities for all ages in an urbanised setting. There will also be a number of Neighbourhood parks which will provide future residents with local recreation opportunities and children's play facilities.

In addition to the more formal public open space, an informal linear park running along the perimeter of developed areas providing for active recreational activities such as walking, cycling, running and informal/ natural children's play as well as habitat creation is proposed.

Land at Norton was identified in Options 2 & 3 of Choices for City Plan 2030 as part of "West Edinburgh", which is described and shown on pages 50 of Choices, and where it is noted that if additional housing land is required, then development here can be supported.

Allocating the Norton Park site for residential-led mixed use development provides a key opportunity for a sustainable, accessible and inclusive development which will help meet housing need and demand. The site is located in the West Edinburgh SDA which, as set out in SDP1, is an internationally recognised area of economic importance.

In the Council's Housing Study, which was submitted as a background document to the Choices for City Plan 2030 consultation, the site at Norton Park was identified as being suitable for development. TW/HL agree with the conclusion that the site is suitable for development although, as noted in the Choices for City Plan consultation, they do not agree with the conclusions for a number of the specific assessment criteria, which should be amended.

The summary of the Council's housing assessment also notes that whilst the site is suitable for housing "This land is still safeguarded for a potential relocation of the Royal

Highland Showground and any allocation for development here would be on the condition of the removal of this constraint". As the Proposed NPF4 has removed reference to the site needing to be safeguarded for the potential relocation of the RHC and this would no longer be a national constraint. Therefore, we submit that the conclusions of the assessment should be amended to reflect this.

The development of Norton Park would support the creation of integrated mixed-use neighbourhoods that combine residential, employment, commercial and community uses with easy to access facilities and services. The site at Norton Park has good access to key public transport including frequent bus services on the A8 and the in-progress Edinburgh Gateway rail link. Above and beyond these existing strengths, the land at Norton Park provides an opportunity to become one of the most accessible locations for new development in West Edinburgh through the proposed tram extension or bus rapid transit (BRT) to Newbridge and potentially a new rail / tram interchange at Ratho Station.

The development would support the concept of '20-minute neighbourhoods' which are a key feature in the emerging NPF4. The delivery of an 'urban core' at the heart of the development would provide a range of services and facilities for residents as well as them having easy access to Edinburgh City Centre via public transport. This proximity to public transport is the key factor which should drive forward new development in Edinburgh and why the Land at Norton Park should be allocated in City Plan. That the site is not on 'brownfield land' does not mean that the site is unsustainable. There appears to be an idealistic view and misconception that all brownfield sites are inherently sustainable and greenfield sites are not. The Council must consider the sustainability credentials of sites holistically which includes infrastructure, greenspace/open space provision and accessibility.

The site is effective and deliverable in accordance with paragraph 55 of the Planning Advice Note (PAN) 2/2010: Affordable Housing and Housing Land Audit being free will be free of constraints satisfying the following seven criteria.

The Plan's housing strategy is not a viable strategy to meet housing need and demand, and there needs to be a combination of brownfield and greenfield sites identified within City Plan 2030 (i.e. an extended Option 3 of the Choices for City Plan). The Land at Norton Park would deliver a sustainable, well connected residential-led mixed use development following the principles set out in emerging national policy. The site is effective and deliverable and could contribute expeditiously to the housing land supply following allocation in City Plan.

Allocating the site at Norton Park for a residential-led mixed use development would support the concept of '20-minute neighbourhoods' which are a key feature in the emerging NPF4. To support the new residential community an urban centre including local services and shops, and a primary school would be delivered to be utilised by both new and existing residents. Furthermore, the current and proposed public transport (including either tram or BTR) would give residents easy access to Edinburgh City Centre. Infrastructure provision and proximity to public transport is the key factor which should drive forward new development in Edinburgh and why the Land at Norton Park should be allocated in City Plan. Just because the site is not on 'brownfield land' does not mean that the site is unsustainable. The Council must consider the sustainability credentials of sites holistically including in terms of their infrastructure provision and accessibility.

To help mitigate the effects of climate change, in accordance with the national and local aspirations for low carbon development, the proposed development at Norton would seek to mitigate carbon through a number of measures including:

An assessment of the embodied carbon of the buildings with the aim of reducing these where feasible.

- Reducing the energy demand and carbon emissions of new homes through fabric and energy efficiency measures,
- The use of low carbon or renewable heating systems; and
- The provision of features to create a low carbon lifestyle such as reducing the need to travel by providing the ability to walk or cycle to a wide range of services and facilities.

Norton Park is a site which is highly accessible, being well-served with existing public transport as well as being a location where the tram or BTR would serve as indicated in the City Transport Mobility Plan. If the site was allocated for housing, it would be fully supported by Policy Inf 5.

TW/HL are strongly supportive of the delivery of a tram or Bus Rapid Transit (BRT) through Norton towards Newbridge which would serve the development with even greater public transport than already exists.

Sustainable transport measures would encourage the introduction of a regular bus service operating through the Site and potentially a Bus Rapid Transit (BRT). Bus stops have been located at regular intervals along the primary and secondary roads to maximise the number of homes which could benefit from these public transport services. The Urban Core would also be close to good, high frequency public transport routes. The locations of the bus stops have ensured that 94% of the developed site is within a 400m walking distance of a bus stop.

The permeable and efficient road layout would also deliver a fully integrated street based pedestrian and cycle network. The proposed primary and secondary roads would allow for a pervasive and connected footpath and cycleway network, set back from the road behind green verges for safety and environmental quality. Shared surface raised tables interrupt the streets to mark nodal points, key junctions and crossing points. Larger lengths and areas of shared surface raised table are located around the neighbourhood parks and outside the primary school. These look to promote slow traffic speeds and give pedestrians and cyclists priority.

### **Site 34. Lennie Cottages**

#### Rosebery Estate (0618)

Remove Lennie Cottages site from Greenbelt and allocate for housing as a stand alone development. for a 0.2ha housing development with a total capacity of 20 homes and associated development principles (design and character with green belt boundary being formed).

Site required to meet needs, and to provide diversity in the land supply delivering a range and choice of housing type tenure and location, as required.

The land at Lennie Cottages has been promoted previously and considered by a Reporter (LDP-230-2 (Ref: 2480)). The Reporter in that case concluded:

“A smaller site at Lennie cottages is also proposed. However the proposed plan through table 4 only addresses the allocation of larger sites. I agree with the council that this smaller infill site would fall to be assessed as a planning application. The allocation of this site would in any event have required the proposed green belt to extend to the rear of the existing cottages. I consider that it is more appropriately retained along Craigs Road which provides a robust boundary to the HSG 19 allocation. Its inclusion as part of the larger HSG 19 site raises similar issues to that above given that optimal densities and site layout are yet to be confirmed through the master-planning process. Adding these sites at this time, given the anticipated programming of the larger site, would in my view do little if anything to contribute to any immediate shortfall in the housing land supply.”

Whilst we accept that when any site is taken out of the green belt a new boundary needs to be drawn. However, it is possible to (given the depth of the site) provide a green belt boundary within the design for the site, leaving only a short section following garden fences (which would seem logical if removing this site from the green belt). This would not be a strange or unusual boundary, any more so than the following;

Maybury (at junction with Maybury road - no defined lines)

Dalmeny (north edge follows rear fences)

Ratho (Hillview Cottages follows rear fences)

Juniper Green (Properties fronting Lanrak Rd West follows undefined line across field)

Currie (Nether Currie Crescent follows rear fences)

Balerno (Properties fronting Harlaw Road follows rear fences).

As a standalone allocation, it would not be bound by the HSG19 densities etc. and delivering in compliance with the principles in Appendix D would avoid an inappropriate proposal to fill this gap in the urban fabric.

The difficulty with the approach advocated by the Reporter and Council previously (i.e. the site should come through the Development Management system) is that, having promoted an application on a greenbelt site at Balerno for 45 units as a departure application against a proven shortfall through the development management process and had it considered at appeal (Ref: PPA-230-2177) particularly at this scale receiving the same conclusion “I find that the provision of an additional 45 houses would not make a significant enough contribution to the shortfall in the 5 year effective housing land supply” to justify granting consent.

Therefore, in a plan where the Council are allocating small sites (4 smallest allocations for 8 units each), this site should be removed from the Green Belt and allocated for housing (15-20 Units). We believe that the case for this development is stronger now than ever given the substantial change occurring in the area (which completely changes the context

of this parcel of land), and the immediately available nature of it (which requires an allocation in this plan to be enable it to be deliverable).

Through our, and others, representations elsewhere on the housing land supply we believe that there is a shortfall that requires additional immediately effective land to be allocated where there is infrastructure capacity to allow its delivery.

Whilst the report submitted in support of this proposal on this issue is from December 2011, the guidance and policy basis against which it was carried out has not changed significantly and the context within which the site lies changed dramatically and will only continue to do so. This site contributes little to the Green Belt objectives, or the overall setting of the city, providing little if any access to the countryside, and is required to meet the strategic objectives of the plan.

Kirkbank Ltd have been overseeing the installation of infrastructure by West Craigs, on behalf of the Partnership. This provides both capacity and connections for this site meaning that, should it be removed from the green belt and allocated for housing this could swiftly deliver.

Councils Housing Land Study assessment assesses the subject site (as part of a much wider area) as being;

- Within West Edinburgh SDA.
- Within 30 min walk to employment clusters, but in excess of 10 min walk to local convenience (however, neither of these assessments consider cycling or other modes of transport).
- Very well provided for in terms of public transport (bus, train and potentially tram).
- Within a SDP1 Green Network Opportunity Area, however, being a small site on the edge of the urban area, enclosed on three sides by development, with the wider Golf Course unaffected, this seems a minor loss.
- Not at risk of Flooding.

The Council's report analysing the 2011 Census, "Topic summary: Housing: dwelling type, tenure, rooms, overcrowding and under-occupancy" (February 2014) states that nearly two-thirds of the total households in the city live in flatted accommodation. This is very high, compared to other parts of Scotland. This Plan represents an opportunity to re-dress this balance, through an allocation of a variety of land for residential development.

### **Site 35. Lang Loan**

#### Miller Homes Ltd (0649)

Objects to the non-identification of land at South of Lang Loan as a Major new development area for housing led development for around 780 homes. The housing led proposal is shown on the Indicative Development Framework submitted in support of this representation.

The site was identified within the Housing Study and Environmental Report prepared in support of the Choices for City Plan 2030 Main Issues Report (MIR).

A supporting Site Assessment Review has been prepared taking into account the indicative proposal shown in Indicative Development Framework and the Development Framework Report. The Site Assessment Review demonstrates that there are no planning or environmental reasons why South of Lang Loan should not be allocated for housing in the emerging City Plan 2030.

A Site Effectiveness Statement has also been prepared in support of the allocation of the site at South of Lang Loan for a housing led development. The Site Effectiveness Statement demonstrates that South of Lang Loan is an effective site in accord with the rest of PAN 2/2010 Affordable Housing and Housing Land Audits. The proposal can be delivered within the period of the emerging City Plan 2030 without external funding.

The development of the site for a housing led development will also make a significant contribution of around 195 affordable homes based on 25% affordable housing provision.

The City Plan 2030 Proposed Local Development Plan (LDP) promotes a housing strategy based on all new housing allocations being located within the defined urban area on brownfield sites. This housing strategy is based on the Council's preferred Option (Option 1) that was set out in the Choices for City Plan 2030 Main Issues Report (MIR).

The Proposed LDP is supported by an updated Environmental Report which ...focuses on the environmental effects resulting from new policies and proposals in the Proposed Plan. The updated Environmental Report states that following the consultation period on the MIR ...all representations were considered and work on the Proposed Plan was progressed.

The Environmental Report has been updated from the Report presented at the MIR stage. The updated Environmental Report provides a summary of the changes made from the MIR to the Proposed Plan stage. This includes a summary of the 16 choices that were set out in the MIR including Choice 12: Building our new homes and infrastructure.

Choice 12 of the MIR had set out three options for the delivery of new homes within the city of Edinburgh authority area. The updated Environmental Report confirms that the Council has progressed with Option 1 of choice 12 of the MIR and states that ...the preferred approach has been taken forward... with ...no green belt release.

In dismissing all greenfield sites as viable options for residential development, the updated Environmental Report states that ...Greenfield sites are likely to have greater impacts and although some of this can be mitigated through the provision of new infrastructure the longer commuter distances means there is a potential risk of additional vehicle trips and associated impacts even with mitigation. The updated Environmental Report, therefore, only provides an assessment of all the policies and proposals set out within the Proposed LDP. The Council has not undertaken any updated assessments of greenfield sites promoted through the MIR process for housing led development. The updated Environmental Report, therefore, has failed to evidence that the Council has considered all representations made to the MIR.

A representation to the MIR process was submitted in support of a site at South of Lang Loan. The purpose of the representation was to demonstrate that the site at South of Lang Loan is suitable for residential and to support the Council's position (as set out in the MIR) that the site has housing led development potential. The representation raised several

concerns with the Council's preferred approach for housing development set out within the MIR.

The representation highlighted the limitations within the Council's Site Assessment methodology set out in the Environmental Report presented at the MIR stage. These limitations included the Council's methodology ignoring the benefits which would be delivered by the proposed development of a site. The Council's approach was only focused on the environmental and other characteristics of the site at present and not how a potential development can mitigate or avoid impacts on the site's intrinsic characteristics. The Council's approach should have been improved to assist its use as a validation tool for selecting a site for future development.

The Council's current rating system also failed to account for the beneficial impacts that the development of a site may deliver through mitigation or improvements. For example, the Council's Site Assessment did not consider a site's proposal and how it can address the requirements set by the Council in terms of its master planning principles.

The Council's rating system also did not allow a comparison to be made against other sites being considered for potential development. It was therefore unclear how the Council intended to confidently identify which sites should be brought forward for allocation within the emerging City Plan 2030.

Appendix 7 of the updated Environmental Report provides a summary of comments made on the Environmental Report presented at the MIR stage. Appendix 7 of the updated Environmental Report includes Council's response to the concerns raised as part of the MIR process.

The Council's response states that the purpose of the Environmental Report, "is to assess the significant environmental impacts of the choices and site options within the Main Issues Report." The Council's response states that this, "information will be used to inform the preparation of the Proposed Plan". The Council's response also states that the finalised Environmental Report, "will be updated to take cognisance of any further information available as part of the process of preparing the Proposed Plan".

The Council has not evidenced that it has updated the Environmental Report to take account of, "any further information available". The updated Environmental Report does not provide updated assessments of any of the greenfield sites identified at the MIR stage or take account of the information provided in support of the allocation of land at South of Lang Loan for a housing led development. The Council's updated Environmental Report simply dismisses the merits of all greenfield sites promoted as part of the MIR consultation process with no consideration of the benefits that can be delivered through the allocation of these sites.

Miller Homes has, therefore, prepared an updated Site Assessment Review for their land interest at South of Lang Loan to demonstrate the suitability of the site for a housing led development. The supporting Site Assessment Review concludes that the allocation of the site at South of Lang Loan will represent a sustainable development proposal. The assessment set out within Appendix 2 of the Site Assessment Review also demonstrates that the site scores well against the Council's rating system set out in Table 5 Methodology for Assessing Sites of the updated Environmental Report for the following reasons:



- The proposal set out in the DFR addresses all of the placemaking principles required by the Council and Scottish Ministers. The aims of the Proposed LDP including the creation of ...mixed-use and walkable communities, linked by better active travel and public transport infrastructure, green and blue networks have also been considered in the development of the proposal as shown in the Indicative Development framework (IDF).
- The proposal will deliver improved accessibility to public transport. The proposal will also provide links into the existing cycle network. This will encourage active travel both within and outwith the site.
- The development of the site will provide areas of accessible open space, greenspace and recreational provision. In total, the proposal may provide around 10 hectares of open space, of which 5.7 hectares is dedicated amenity space. The proposal will incorporate a SuDS strategy which will include the discharge of surface water at greenfield rates. This will prevent increased flooding as a result of climate change.

These findings set out in the Site Assessment Review demonstrate that South of Lang Loan can be considered as a sustainable location for future development, generating far reaching benefits for existing as well as new residents. This takes into account the benefits and the mitigation measures that will be delivered by a proposal on this site.

These measures include the safeguarding of land for a Mobility and Neighbourhood Hub which is a local and accessible place which brings together different modes alongside associated facilities, services and information to encourage more sustainable travel. This will support the Council's previous proposal (as set out in the MIR) for a proposed new Park & Ride facility along Lasswade Road within the south east corner of the site.

There are therefore no planning or environmental reasons why South of Lang Loan should not be allocated for housing in the emerging City Plan 2030. For the reasons set out above, the Council's Environmental Report should be updated to demonstrate that it has considered the merits of greenfield sites for housing development such as the site at South of Lang Loan. This should include consideration of the Site Assessment Review, Development Framework Report and Indicative Development Framework submitted by Miller Homes in support of the allocation of South of Lang Loan.

Based on the findings of these revised assessments, the site South of Lang Loan is a considered to be a sustainable development proposal. Page 6 of the Proposed LDP 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 resilient, connected neighbourhoods, in the right locations, with the right infrastructure."

The development of South of Lang Loan will contribute to this objective. The development of the site for a housing led development will also make a significant contribution of around 195 affordable homes based on 25% affordable housing provision.

This representation is also supported by an Education Infrastructure Note. The purpose of the Education Infrastructure Note is to provide an assessment of the education infrastructure requirements arising from the impacts from new homes from the

development of the site. The findings of the note are that education capacity is not a barrier to the allocation of further housing at this location. The impact of new pupils from the development of the site can be mitigated through the expansion of existing school infrastructure and new infrastructure on land already available to the Council.

The lack of education constraint in this area was highlighted by the Council's at the MIR stage through the identification of land in this area as suitable for greenfield housing development.

Miller Homes is willing to make a proportionate financial contribution towards the cost of providing the necessary education as a result of the direct and cumulative impact of the development in accord with Circular 3/2012.

There are no planning or environmental reasons why South of Lang Loan should not be allocated for housing in the emerging City Plan 2030.

### **Site 36. Land south of Murrayfield Hospital**

#### Spire Healthcare Ltd (0719)

Seek the allocation of under-utilised land at Murrayfield Hospital for residential development for housing for older people / specialist housing or a care home. Prepared to also support a more flexible allocation that could include market and affordable housing. It is considered that the site can support a three or four storey care home of c. 50-70 beds or a residential development of between 20-30 homes.

The site is free from any significant constraints that would threaten the effectiveness of the site or which could not be mitigated acceptably by the delivery of a high quality design solution.

Restricting development to the western part of the site and retaining the remainder as open space will preserve the setting, and views to and from, Beechwood House. It will also retain the sense of this open space continuing from the setting of Corstorphine Hill further to the east (and behind from long distance views) and preserve the core part of its existing green network value.

Development of an appropriate density can be suitably provided for on this flatter area of land at the western edge of the site, with a care home or residential block of c. 4 storeys remaining appropriate to the context of the adjacent Holiday Inn (which is circa 6-7 storeys in height), or with detached / semi-detached residential properties being provided.

The site is located within a 20-minute walking distance (800m) of Corstorphine Town Centre, which offers a full range of services and facilities. The site is also directly adjacent to strong public transport services which offer easy accessibility into the City Centre. As such, the proposed site can fully deliver on the 20-minute neighbourhood concept that is being advocated within the draft NPF4, with provision of high quality and energy efficient new homes or care home accommodation that can improve the choice of housing for older people and / or families within the City.

The proposal will enable the delivery of a well-connected and sustainable site to be developed to provide new residential development to help meet the City's needs, be it as a

care home, housing for the older people / specialist housing or a mixture of private and affordable market housing.

Spire request that that land to the south of Murrayfield Hospital is identified as within the Urban Area of Edinburgh (removed from the green belt) and be allocated for development on the western part of the site with the remainder preserved as open space.

The site is not considered to have any insurmountable physical or technical constraints to development, with a well designed development being capable to respect the landscape character of the area and preserve the setting of adjacent listed buildings. It is considered that issues highlighted within the site assessments undertaken for the background papers can be addressed and that they would not prevent development of the site for housing - be it a care home, a form of specialist housing or market housing - within the lifetime of City Plan 2030.

The site is located within a strong market location and Spire are confident that, allied with a lack of significant site constraints, the site can be delivered with an appropriate development partner, and without public funding, within five years of the adoption of City Plan 2030. As such, the site is considered to be effective and suitable to help deliver the Plan's housing land requirements on a sustainable, well connected site.

The development of this under-utilised greenfield site, which is well located in relation to the services of both Corstorphine Town Centre and the City as a whole, will help to deliver the Council's housing land requirements and reduce the City Plan 2030's over-reliance on brownfield sites. It can also assist in the much needed increased level of choice and delivery of specialist housing for older people.

The site is in a highly accessible location which has a choice of sustainable active travel and public transport options to minimise the need for travel via unsustainable sources.

### **Site 37. Land east of Winton Gardens**

#### Esk Property LLP (0726)

There are significant risks associated with the Council's proposed spatial strategy to deliver all new housing on brownfield sites. Consequently, to ensure a deliverable supply of housing land (including for care and retirement living type developments), the Council must consider the release of some land within the Green Belt. As a result, the site 'Land to the east of Winton Gardens, Edinburgh' should be removed from the Green Belt and allocated for an age restricted development comprising assisted living, retirement (over 55) accommodation and care facilities.

### **Site 38. Land at Baberton Road**

#### Stoddart Family (0749)

Object to non allocation of a 10.9ha site at Baberton for housing development. The site was included in the Main Issues Report as site a being considered for residentially-led development as part of a masterplanned area alongside the land to the north.

Edinburgh is the fastest growing city in Scotland and has a significant and beneficial economy that impacts not just east central Scotland, but throughout the nation. It is imperative that the City Plan has the ambition and purpose to sustain the continued economic growth forecast over the next decade and that this informs land use choices in the LDP.

In March 2020, Colliers lodged representations to the City of Edinburgh Council's Main Issues Report (MIR) – 'Choices for City Plan 2030' on behalf of the landowners.

Our clients were supportive of the Main Issues Report which outlined that the site could be considered suitable for development for a variety of uses, with residential use being the focus. However, it is noted that the Council have decided upon an alternative strategy which avoids the development of any greenfield land in the next plan period. This approach is not deliverable, in terms of the housing numbers required in the plan period, and ultimately will not deliver a sustainable plan.

The opening section of the City Plan 2030 provides a brief summary of the aims and objectives of the Local Development Plan. Our clients note the following comments: "Edinburgh is one of the best cities in the world in which to live, work and study."

Paragraph 1.1

"There is a demand for new homes and rising housing costs." Paragraph 1.1

"We are committed to eliminating poverty, ensuring residents have enough money to live on, have access to work, learning and training opportunities and have a good place to live. We are committed to building 20,000 affordable and low-cost homes over the next 10 years." Paragraph 1.4

"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 resilient, connected neighbourhoods, in the right locations, with the right infrastructure." Paragraph 1.5

"A Local Development Plan protects places of value, sets out locations for new homes and businesses, and ensures essentials for a good quality of life are in place - such as public transport, active travel, schools, healthcare and green space." Paragraph 1.6

Our clients share the objectives that the City of Edinburgh Council have outlined in the introduction. It is widely recognised that Edinburgh is a leading place worldwide to live and work. The demand for new homes in an expanding city, with a rising population and as an attractive place to relocate, from throughout Scotland, the UK, Europe and globally is a planning challenge the City Plan requires to fully address. Ensuring a sufficient number of homes and full range of tenure provision is provided for to meet all housing requirements, and that all Edinburgh residents 'have a good place to live' (para 1.4) is the main challenge the City Plan requires to address and successfully reconcile. Developing new homes to the highest building standards in sustainable locations is a necessity for the City Plan alongside appropriate transport, educational, community and social facilities being available for all residents. The City of Edinburgh Council cannot shirk responsibility for planning for its population and providing living accommodation for those who need and want it.

### **Site 39. Edge of Edmonstone Estate**

Scottish Enterprise (0760)

Response relates to a 2.73-hectare (6.75 acre) site which is wholly owned by Scottish Enterprise (SE) and surplus to delivery of its core economic development objectives. Scottish Enterprise agrees that new development should connect to and deliver the city-wide, regional, and national green network. The allocation of the SE Edmonstone site for housing will provide the opportunity for improved green network links between the site to the emerging new community at Edmonstone, Greendykes and the BioQuarter. SE has discussed access to the site with CEC Transport and is satisfied that viable access options are achievable. By ensuring that future development on this site provides green network connections, the allocation of the SE Edmonstone Site for housing will aid in the delivery of Policy Env 6.

The purpose of the disposal of the site is to secure funds for reinvesting in economic development activity in Scotland, in line with the Scottish Government's objective of achieving inclusive and sustainable economic growth. Since the commencement of the marketing of the site in August 2019 there has been market uncertainty about the future development potential of the site, and SE considers that the inclusion of the site in the LDP will provide the necessary certainty to encourage committed offers for the site. The site has the potential to deliver up to 300 homes and in addition to the wider economic development benefits, the inclusion of the site for housing development will deliver affordable housing adjacent to BioQuarter, providing significant employment opportunities for future residents.

The proposed LDP states as a key objective: "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 resilient....." (page 6). SE considers that this overarching objective of the proposed LDP as a whole, is consistent with the objectives of SE for the SE Edmonstone Site and the wider BioQuarter as a whole.

The SE Edmonstone Site is in a highly accessible location, close to existing infrastructure and amenity. High quality housing can be provided on the SE Edmonstone Site, which will complement the emerging new community at Edmonstone and Greendykes, in accordance with the aims and objectives of the proposed LDP.

The SE Edmonstone Site is located within an area which has experienced a substantial number of planning applications in recent years, predominantly for residential development, as a result of the pressure for new housing land to serve the south-east Edinburgh market. Progress with the Shawfair development located south-east of the Edmonstone Estate, in the vicinity of Danderhall, has been relatively slow since it received planning permission in 2014 and as a result, house builders have increasingly targeted the area north-west of the Wisp, including the Edmonstone Estate and land to the north in the vicinity of Greendykes.

A full schedule of planning permissions in the vicinity of the SE Edmonstone Site is included at Appendix 1 of the SE Edmonstone Supporting Document. The planning proposals can be considered under two broad headings for simplicity purposes: those relating to the Edmonstone Estate and those relating to Greendykes/the Wisp to the north-east of the Edmonstone Estate.

As a result of planning permission granted by Scottish Ministers at appeal in July 2015, the principle of residential development has been established across the Edmonstone

Estate, up to the south-eastern boundary of the SE Edmonstone Site. The extent of the planning approval is outlined in Figure 2 of the Supporting Document.

The planning permission (14/01057/PPP) makes no reference to a specific number of houses but it is accompanied by two indicative layout plans showing up to 368 houses at the site. The Ministers concluded that, given the significant shortfall in the effective five-year housing land supply in the Edinburgh area, and the fact that the development plan, at that time, was out of date, the proposal would meet key Scottish Planning Policy criteria for approving additional housing land supply that contributes to sustainable development. They considered that the cumulative environmental and infrastructure impact of the proposal would not be so significant to undermine the wider strategy of the (then) emerging Edinburgh Local Development Plan (LDP), and that any impact on local infrastructure including transport, education, affordable housing and drainage could be satisfactorily mitigated through the use of appropriate conditions. The Edinburgh Local Development Plan (LDP) was adopted after the appeal was decided, in November 2016.

The land to the south-west of the SE Edmonstone Site, still located within the Edmonstone Estate, and referred to as the "walled garden" and the "eight-acre field", has been a subject of planning permissions since 2008 when a care village was granted planning permission. More recently planning permission was granted at appeal for a residential development in March 2013 (12/01624/FUL) and amended in November 2014 (14/00578/FUL).

In essence therefore, the SE Edmonstone Site is to be bounded on its south-east and south-west boundaries by extensive housing developments. Whilst there is little progress with the implementation of the Edmonstone planning permissions, Miller Homes is nearing completion of its 54 unit 'Manor Wood' development at the 'eight acre field' site, including a new access to the site from the from Old Dalkeith Road as an alternative to the access to the site from the Wisp.

Turning to developments in the vicinity of Greendykes/the Wisp to the north-east of the SE Edmonstone Site, recent planning approvals are fewer in number, although there is no less developer interest in this area. Development within Greendykes is established by a previous allocation for residential development which was carried forward in the Edinburgh LDP.

Planning permission for an additional 72 houses was granted to Springfield Properties in May 2016 for a site on the eastern edge of the existing Greendykes allocation, adjacent to the Wisp, and the same developer submitted a proposal, in November 2016, for a more comprehensive housing development, including a primary school, on land stretching from the eastern edge of the existing Greendykes allocation south to include the SE Edmonstone Site (16/05417/PPP). Whilst submitted in principle, the indicative proposals for the site illustrated a primary school and affordable housing located within the SE Edmonstone Site, with a new access road provided to the site from the Wisp. A plan of a proposed location and layout is on Figure 4 of the Supporting Document – the application has been withdrawn.

Springfield Properties submitted a planning application in March 2019 (19/01481/FUL) for 505 residential dwellings, retail, open space and associated infrastructure as an extension of the Greendykes development into the South East Wedge Parkland. The application was refused at the Development Management Sub-Committee on 31 July 2019 for reasons

relating to conflict with Green Belt policy, loss of the Parkland and conflict with other LDP policies.

In addition to the Edmonstone Estate and Greendykes/Wisp areas of emerging residential development, the SE Edmonstone Site is, of course, bounded by the extended Bioquarter site and South-East Wedge Parkland. This is included in the adopted LDP and full details are provided in the Edinburgh Bioquarter and South-East Wedge Parkland non-statutory Supplementary Guidance (December 2013).

The adopted Edinburgh LDP reflects, to some extent, the planning history in the vicinity of the SE Edmonstone Site. The SE Edmonstone Site itself retains a Green Belt allocation in the adopted LDP where development is only supported where it meets certain criteria (Policy Env10). Development of the SE Edmonstone Site for residential purposes would not, of course, meet this policy requirement.

Unlike the position in relation to the SE Edmonstone Sites, the planning approvals at appeal for the Edmonstone Estate land to the south-east of the SE Edmonstone Site, and the planning permission for the Springfield Properties development adjacent to the Greendykes development at the Wisp, are both included as allocations in the adopted LDP (HSG40 and HSG41 respectively).

As a result of the decisions/allocations within the immediate context of the SE Edmonstone Site, continuing to define the site as part of the Green Belt fails to satisfy any of the strategic objectives for which Green Belt is defined. The urban edges of BioQuarter and HSG40 with the Parkland provide robust, defensible boundaries to the Green Belt over the long term, and the SE Edmonstone Site's northern boundary with the Parkland would logically continue this boundary, thereby maintaining the role of the Green Belt in this location. The loss of the SE Edmonstone Site from the Green Belt in this location would have no detrimental impact on the strategic role of the Green Belt in south-east Edinburgh.

It is clear from the review of recent planning history and up-to-date planning policy set out in the previous sections that there is an inconsistency between the allocation of the SE Edmonstone Site as Green Belt, where residential development is to be resisted, whilst surrounded on all sides by allocations or planning permissions for major employment or residential development. The only exception to this is to the north-east where the clear policy support for the retention of the South-East Wedge Parkland remains. SE has committed significant investment, alongside the Edinburgh and Lothians Greenspace Trust and CEC Parks and Leisure Department, in the development of Little France Park with green infrastructure which has important community benefits and delivers accessible active travel routes and creates a robust Green Belt edge (see Figure 7 of the Supporting Document).

Specifically in response to Choice 12C of Choices for City Plan 2030, SE would contend that the release of the SE Edmonstone Site would be consistent with the urban land release despite the Green Belt allocation, given the illogical nature of its continued inclusion within the Green Belt.

In conclusion, allocating the SE Edmonstone Site for housing as part of the emerging City Plan 2030, will aid in meeting the aims and objectives of Choices 9-12. Removing the

existing site allocation will have no discernible impact on the strategic role of the Green Belt and a housing allocation will logically continue the Little France Park boundary.

This site can contribute to the market and affordable housing targets on a priority strategic sustainable transport corridor and where disposal receipts will support further economic development investment. It is respectfully requested that the Green Belt allocation of the SE Edmonstone Site is removed as part of the City Plan 2030.

In relation to the SE Edmonstone Site, the Special Landscape Area designation extends significantly beyond the boundaries of the SE Edmonstone Site and include the walled garden and eight-acre field sites for which planning permission has been granted on a number of occasions as referred to throughout the SE Edmonstone Supporting Document. It is therefore considered that housing development at the SE Edmonstone site should be acceptable in relation to the Special Landscape Area.

SE agrees that development impacting Local Nature Conservation Sites should be permitted where adverse effects are adequately offset to maintain the integrity of the interests affected and the involvement of people. In relation to the SE Edmonstone Site, this approach has been considered acceptable by CEC and the DPEA by granting extensive residential development at adopted LDP legacy allocated housing site HSG 40 (Edmonstone). As such residential development at the SE Edmonstone Site should be acceptable subject to appropriate mitigation measures.

The site is located within Strategic Sustainable Transport Corridor 3 where transit-led solutions can help reduce carbon, promote equity, support healthier lifestyles and deliver sustainable economic growth. Given its proximity to existing and emerging residential and other development, the site is well suited for high density housing development and should be allocated as such.

Development should be directed to where there is existing infrastructure capacity, including education, healthcare, and sustainable transport links. In relation to the SE Edmonstone Site, this is located within Strategic Sustainable Transport Corridor 3 where transit-led solutions can help reduce carbon, promote equity, support healthier lifestyles and deliver sustainable economic growth. Increasing the residential density in this area, will also aid in delivering potential new infrastructure within the plan period. The allocation of this site for housing is therefore consistent with the aims of Policy Inf 1.

The proposed Plan has a clear objective of providing high quality housing in sustainable locations, protecting against the loss of homes to other uses, delivering affordable homes and the overall increased provision of housing in the city. The SE Edmonstone Site is in a highly accessible location, close to existing infrastructure and amenity. High quality housing can be provided on the SE Edmonstone Site, which will complement the emerging new community at Edmonstone and Greendykes, in accordance with the aims and objectives of the proposed LDP.

#### Planning Contexts

In addition to the Edmonstone Estate and Greendykes/Wisp areas of emerging residential development, the SE Edmonstone Site is, of course, bounded by the extended BioQuarter site and South-East Wedge Parkland. This is included in the adopted and proposed LDP, and full details are provided in the Edinburgh BioQuarter and South-East Wedge Parkland non-statutory Supplementary Guidance (December 2013).



The Guidance includes a series of Development Principles for the BioQuarter site referring to higher density development of up to 295,000 sqm of gross floor space of which 245,000 sqm would be in the life sciences sector together with 50,000 sqm of ancillary floor space which could include retail, professional services, food and drink, general business, hotel, housing, and student accommodation (Principles 2b, c and d of SG).

The BioQuarter partners are currently seeking a joint venture partner to assist in the realisation of the vision for the site, which has been allocated in the Proposed City Plan for health innovation-led mixed use development, including around 2,500 homes which will extend to the north-west boundary of the subject site.

The SE Edmonstone Site is also located within a Special Landscape Area and Local Nature Conservation Site and Policies Env11 and Env 15 respectively are relevant. These seek to resist development which would have a significant adverse impact on the special character or qualities of a Special Landscape Area, and on Local Nature Conservation Sites. Both of these designations extend significantly beyond the boundaries of the SE Edmonstone Site and include the walled garden and eight-acre field sites for which planning permission has been granted on a number of occasions (including by Scottish Ministers), as referred to above.

Unlike the position in relation to the SE Edmonstone Sites, the planning approvals at appeal for the Edmonstone Estate land to the south-east of the SE Edmonstone Site, and the planning permission for the Springfield Properties development adjacent to the Greendykes development at the Wisp, are both included as allocations in the adopted LDP (HSG40 and HSG41 respectively).

The adopted LDP is to be replaced by City Plan 2030 and the main issues report, 'Choices 2030', was published for consultation in early 2020. SE submitted a representation to CEC during the consultation period relating to the SE Edmonstone Site; however, this does not appear to have been incorporated into the proposed LDP. As such, many of the comments below reiterate those made in April 2020.

Following consideration of the planning history of the surrounding area, the current policy position, and the emerging City Plan 2030, the proposed residential allocation of the SE Edmonstone Site is acceptable for the following reasons:

- The proposed LDP has demonstrated the clear objective of CEC to provide more high-quality housing to meet demand in Edinburgh and address the issue of affordability. The SE Edmonstone Site is a logical housing opportunity given the planning history associated with the surrounding sites, as outlined above. There are no constraints applicable to the SE Edmonstone Site which are any less insurmountable than those applicable to the surrounding sites, all of which have been allocated for development. A geo-environmental desk study has confirmed that there are no constraints to development of the site in terms of ground conditions. SE has discussed access to the site with CEC Transport and is satisfied that viable access options are achievable.

The proposed LDP promotes CEC's preference for housing delivery in the urban area. The proposed LDP spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram. The SE Edmonstone Site is excluded from this consideration, despite SE being a public sector partner, and the previous requests by SE to have the site considered for inclusion as a housing allocation in the LDP (see submission of 24 October 2019 and 27 April 2020).

It is entirely appropriate, given the local sustainable transport links, existing infrastructure, and proximity to existing and emerging residential and other development, to conclude that the site should be included as an urban housing site allocation, consistent with the aims and objectives of the proposed LDP. The site is located within a Strategic Sustainable Transport Corridor where transit-led solutions can help reduce carbon, promote equity, support healthier lifestyles, and deliver sustainable economic growth.

As a result of the decisions/allocations within the immediate context of the SE Edmonstone Site, continuing to define the site as part of the Green Belt fails to satisfy any of the strategic objectives for which Green Belt is defined. Scottish Planning Policy (SPP) requires LDPs to establish “clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads”. The urban edges of BioQuarter and HSG40 with the Parkland provide robust, defensible boundaries to the Green Belt over the long term, and the SE Edmonstone Site’s northern boundary with the Parkland would logically continue this boundary, thereby maintaining the role of the Green Belt in this location. The loss of the SE Edmonstone Site from the Green Belt in this location would have no detrimental impact on the strategic role of the Green Belt in south-east Edinburgh.

It is clear from the review of recent planning history and up-to-date planning policy set out in the previous sections that there is an inconsistency between the allocation of the SE Edmonstone Site as Green Belt, where residential development is to be resisted, whilst surrounded on all sides by allocations or planning permissions for major employment or residential development. The only exception to this is to the north-east where the clear policy support for the retention of the South-East Wedge Parkland remains. SE has committed significant investment, alongside the Edinburgh and Lothians Greenspace Trust and CEC Parks and Leisure Department, in the development of Little France Park with green infrastructure which has important community benefits and delivers accessible active travel routes and creates a robust Green Belt edge (see Figure 7 above).

SE would contend that the release of the SE Edmonstone Site would be consistent with the urban land release despite the Green Belt allocation, given the illogical nature of its continued inclusion within the Green Belt.

#### **Site 40. Lanark Road West**

John Brady (0353)

Objection to the proposed allocation of land lying to the north of Lanark Road West, Balerno as part of the Green Belt. Objection specifically requests that the subject site and adjoining lands should be removed from the Green Belt with the subject site also being designated for housing purposes with an indicative capacity for c. 6 units. Representations, to this effect were also made to the Choices for City Plan 2030.

The subject site which measures 1.04 hectares is located at 572 Lanark Road West on the western side of Balerno approximately 12.8 km to the south west of Edinburgh City Centre. The site, which is relatively narrow and sloping has a general east/west orientation with a most favourable aspect. It is located between a dis-used quarry to the north and the A70 which runs along its southern and eastern boundaries. The site is accessed from a single point at its north eastern corner which leads to a single storey garage/shed. Parts of

the site have been the subject of engineering works given it a brownfield and partially unkempt appearance. A group of broadleaf trees marks the western edge of the site and are a prominent feature when viewed from the A70. A stone wall bounds the site to the north of Lanark Road West (A70).

The northern boundary of the site is formed predominantly by vertically boarded timber fencing beyond which is an abrupt edge overlooking the former quarry referred to above and a substantial dwelling of modern design (579 Lanark Road West). Beyond the western boundary and part of the southern boundary on the opposite side of Lanark Road West (A70) there exists a significant number of individually designed dwellings in generously sized plots giving this area an urban appearance albeit of low density. Part of the southern boundary (eastern part) beyond Lanark Road West comprises a woodland area. To the east of the site, again beyond the A70 is the Ravelrig Hill Housing Development. Ravelrig Hill can be accessed from the application site via an existing pedestrian path on the opposite side of Lanark Road West (A70) thus linking it with the established footpath network serving the settlement.

The site forms and has the characteristics of an 'infill site' sandwiched between development to the north, south, east and west and within the recognised limits of the urban area as defined by both the Balerno signage and 30 mph speed limit signs which can be found erected, some 125 metres to the west.

The indicative layout submitted separately outlines how the site could be developed for six bespoke contemporary and exemplary designed dwelling houses incorporating a mixture of single storey (with accommodation in roof spaces) and split level properties. All existing trees of significance would be retained and additional landscaping proposed to further integrate the dwellings within the site and enhance the character and appearance of both it and the wider area. It should be noted that the layout below formed the basis for a favourable recommendation towards the granting of planning permission in principle by the Council's Planning Department under the terms of Planning Application Reference Number 20/00302/PPP.

The zoning request is being promoted on the fundamental premise that the subject site and other existing residential development to the north, west and south should be considered as forming part of the Balerno Settlement envelope rather than the Green Belt as shown in the diagram submitted separately. Viewed within the context of the surrounding built development; speed limit zones; and the signage on the public road announcing the arrival of Balerno to those travelling from the west, the site exhibits the characteristics of an infill/gap site within an urban area which is appropriate for development rather than a site within the Green Belt which is inappropriate for development. In that regard the following points are also of significance:

- the site, in its present condition detracts from rather than contributes to the character of Balerno;
- the development of the site will not contribute to or lead to the coalescence of neighbouring towns;
- the site is located in a sustainable and popular location within the Edinburgh Housing Market;

- the redevelopment of the site will support the regeneration of the area within which it is located and make a positive contribution to the character, appearance and landscape setting for the settlement; and
- the site is not accessible to the general public and as such does not provide for access to open space and/or the countryside.

### **Site 41, Land south of Gilmerton Station Road**

#### MacTaggart and Mickel Homes (312)

Object and request the removal the site south of Gilmerton Station Road from the green belt and allocate for residential development.

In the adopted City of Edinburgh Council Local Development Plan 2016, M&M secured the greenfield, green belt housing land release at Gilmerton Station Road (HSG 24). At present this site is being developed for housing with Miller Homes, Barratt Homes and Persimmon Homes all currently developing their phases at this site. It will also provide 25% affordable housing, which is also being built out at present. Land is also set aside for a new primary school as part of this allocation.

The site under the control of M&M is the greenfield undeveloped agricultural land which extends to approximately 30Ha (75 acres) south of Gilmerton Station Road. There is also an industrial and scrapyards area (Bernard Hunter) that secured planning permission (19/02122/PPP) in November 2019 from CEC for Gilmerton Gateway, a retail, professional services, food/drink, business, industrial, hotel and leisure mixed use proposal.

The landholding under the control of M&M south of Gilmerton Station Road is available now, in the short term for the provision of a landscape-led and locally appropriate residential development within the city boundary of Edinburgh.

The site currently comprises arable farmland and sits within the statutory Green Belt. There are overhead power lines that traverse the site.

Mactaggart and Mickel would undertake a landscape led masterplan for the future development of this landholding, upon allocation. This work would provide a comprehensive appraisal of the site, its currently changing context and develop an initial conceptual framework, outlining the development footprint of the development and the means via which this can be provided to follow sound placemaking principles.

The site's position within the existing city boundary and based on M&M's experience locally at Gilmerton Station Road, it is considered that the allocation of the landholding to the south of Gilmerton Station Road, will allow development to come forward from year 3 from the adoption of the City Plan onwards. This site can deliver new residential homes from years 3-5 inclusive and from years 5-10 of the City Plan 2030. This will usefully supplement the housing land provision within the City, with a deliverable and effective site coming forward within the plan period.

It is acknowledged that a Protection of Biodiversity and the Local Nature Conservation Site that runs along the northern boundary and low density development can mutually co-exist. This can be worked into the Masterplan for the landholding at the outset and can form an attribute for the site.

## **Site 42. East Foxhall**

### Landowner of East Foxhall (0544)

Object to non allocation of site at East Foxhall for housing development. It is requested that this change is made, with an indicative capacity of 100 homes on the site.

The development of the Foxhall site for housing would meet with the 20-minute neighbourhood approach. The site is located a 600m walk from the allocated centre of Kirkliston. The centre comprises a number of local shops and services, alongside regular bus links to Edinburgh and West Lothian. There is also an extensive pathway network surrounding the site, which includes safe routes for pedestrians to reach the local centre and the services it provides. This connectivity will be improved by the pathway improvements and pathway creation required by the adjacent East Foxhall development site.

In order to assess the appropriateness of allocating a development site, the Council previously undertook within their Supporting Housing Study for Choices, an assessment of a variety of sites. This was completed without the benefit of site specific supporting technical assessments, a number of which were completed to support the representations made to Choices.

In regards to the sites taken forward as proposed allocations within City Plan, these have also been subject to an environmental assessment, however as the site of East Foxhall has not been identified as a proposed housing site no environmental assessment has been completed by the Council.

To help demonstrate the appropriateness of the site of East Foxhall, this assessment has been undertaken and is included in the attached submission, in a similar format to the assessment undertaken by the Council for proposed housing allocations.

As the assessment demonstrates, there is appropriate mitigation which can be delivered through appropriate wording for the allocation of the site as a housing site, or through the development management process. This would ensure that there would be no significant negative environmental effect on any of the criteria identified by the Councils Environmental Assessment.

In the Plan, the East Foxhall site is identified as green belt land out with the settlement boundary. The runway safeguard area crosses the south east corner of the site, however this area is not proposed to be developed.

We request that the green belt allocation should be removed from the East Foxhall site and for it to be included within the settlement boundary of Kirkliston. The whole site should then be allocated for residential development. The removal of the site from the green belt is justified if the site is to be allocated for residential development, as discussed further below.

During the examination of the current LDP, the adjacent Factory Field site was found by the Reporter to be a suitable development site and that it should be removed from the

green belt, included within the settlement boundary, but not fully allocated for residential development as it was considered this could be dealt with through the development management process.

Regarding the allocation of Factory Field as green belt, the reporter tested the site against Policy 12 of SESplan SDP, overall finding that the objectives of green belt would not be significantly undermined by housing development at Factory Field, nor would it affect the landscape setting of the city. We have therefore assessed the East Foxhall site against the criteria set out within Policy 12 of SESplan SDP, which is copied below for reference:

Taking each criteria in turn:

The purpose of criteria a) is to prevent coalescence between existing settlements. The development of the East Foxhall site would not significantly increase the settlement boundary to any other nearby settlement and therefore removing the site from the green belt and allocating it within the settlement boundary of Kirkliston is considered to comply with this criteria.

CEC have already recognised that East Foxhall could form a residential development site and therefore it is considered to be an appropriate location for development. As such, this criterion can be complied with.

The East Foxhall site is well contained visually, surrounded by high hedges and tree lined field boundaries. It forms part of the study area which is close to the centre of Kirkliston and as such would form a well-integrated and logical urban extension of the town. In accordance with the assessment the East Foxhall site is located to the northern part of the assessment area away from the setting of Foxhall House and gardens which will allow the setting to be protected. This therefore demonstrates compliance with criterion c).

At present the site is utilised as agricultural land and therefore has no easy access for the public. These proposals would introduce significant open space as part of the development, accessible to all. In addition, the site is well located to existing active travel networks, such as the National Cycle network, providing potential future residents good access to open space and the countryside of surrounding areas, complying with criteria d) of the policy.

Additionally, the Council have previously completed a Landscape and Visual Assessment of greenfield sites to support Choices, with area 29 (Conifox) under sector 5 covering the East Foxhall Site. The site is identified on this map as part of the submitted document.

East Foxhall has been assessed as lying within the Local Character Area 10 – Almond Farmland, where site 29 (Conifox) is assessed as having 'some scope to accommodate housing providing that the setting to Foxhall House, particularly its parkland and walled garden is protected'. Additionally, the assessment found that the site is 'close to the core of Kirkliston and is visually contained by woodland and high hedges'. This position is supported by our own technical assessments, which demonstrates the site is generally well contained by mature planting.

For these reasons, the site should be removed from the greenbelt and allocated as a housing site with an indicative capacity of 100 units.

#### **Site 43. Riccarton Village**

### Miller Homes (0256)

Green Belt should be removed at the site of Riccarton Village and it should be identified as a 'major new development site' for housing led development.

Riccarton Village can be masterplanned to support the principles of the 20-minute neighbourhood and is not limited in doing so by the existing urban fabric of the city. Instead, it can be planned to provide for the needs of new residents and existing communities alike.

Also, the future expansion and development proposed at Riccarton University Campus and Business Park could increase car usage without the interventions proposed at Riccarton Village i.e. the proposed new transport hub at Curriehill Station with electric bike hire, bus terminus and a 400-space park and ride with electric charging spaces. This intervention can help ensure that Riccarton University Campus and Business Park is developed in a sustainable and accessible way. Riccarton Village is an obvious choice for an allocation in the City Plan.

There remains a significant shortfall in the scale of new housing allocations required to meet the housing land requirements in full.

Section 14 of the Environmental Assessment (Scotland) Act 2005 requires the preparation of an environmental report that identifies the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives to the plan or programme.

The Environmental Report dated January 2020, which was undertaken at the time of the Choices for City Plan 2030, considered choices for “building new homes and infrastructure”. The Council’s preferred choice was to have all new development delivered by the Council and its partners within the urban area to minimise Green Belt release. Two reasonable alternatives were also considered; the first was for market led Green Belt release and the second was for a blended approach where the Council delivered more land in the urban area and released some land from the Green Belt.

However, as highlighted in our response to the Choice for City Plan 2030, the Council failed to properly consider the reasonable alternatives because they did not take all relevant greenfield sites into consideration, including this site despite the Council being aware that it was being promoted for development and which has significant potential to deliver a new 20-minute neighbourhood. No rationale was provided within the Environmental Report as to why some greenfield sites were considered, and why some greenfield sites were not. As such, the Council preferred choice has not been properly tested against the reasonable alternatives.

Indeed, our own environmental assessment of this site demonstrated that it scored positively in creating opportunities for active travel and accessibility to public transport given the proximity to Curriehill Station and transport hub proposed within the development, offers opportunities for social interaction with direct connections to the adjacent university and the proposed village centre, can create defensible Green Belt boundaries, would create a logical extension to the existing settlement and that ultimately it was an obvious allocation in the City Plan.

The Environmental Report dated September 2021 is included in the evidence base of the City Plan. It identifies that the Council's preferred approach for building new homes and infrastructure is within the urban area, with no Green Belt release proposed. It goes on to say that since a decision has been taken not to include any new greenfield sites within the City Plan there is no assessment of these sites in the Environmental Report. However, the Council cannot conclude, as they have done, that their preferred approach is the most appropriate strategy for the City Plan since they have still failed to adequately consider the reasonable alternatives of market led Green Belt release and a blended approach. To rectify this procedural issue, the reasonable alternatives should be reconsidered which should include an assessment of all reasonable greenfield sites that have been put forward for development. Riccarton Village is a reasonable alternative on the basis that the site is available, eminently deliverable, now promoted by a major housebuilder, located adjacent to a major employment and educational hub of the city, adjacent to an existing train station, within an identified rapid transit corridor, and of a scale that significant levels of affordable housing, market housing, and a range of employment and community services would be provided generating significant economic, social and environmental benefits.

To aid this assessment the Council should refer to the earlier representations to the Choice for City Plan 2030 which provides an environmental assessment of this site. The Healthcare Appraisal, dated September 2021, identified capacity issues with healthcare provision arising from the proposals in the City Plan. Riccarton Village is of a scale where it would incorporate health facilities including medical practice, dental practice, and pharmacy in the village centre which will scaled appropriated to serve existing and future residents within the area and therefore not place any undue burden on existing facilities.

It is also noted that the SFRA does not exclude sites from the City Plan just because some parts of the site are at risk of flooding, and instead simply recommends that development is avoided in these areas and that flood risk assessments are provided for these sites. Indeed, whilst some parts of Riccarton Village are at risk from flooding, Flood risk is not a reason to exclude Riccarton Village as a housing proposal in the City Plan. This was demonstrated in the Flood Risk Technical Note that was provided with the representations submitted to the Choices for City Plan 2030, which concluded that the floodplain within the site is suitable for sports pitches, recreation areas and some types of parking (not directly associated with residential development). This resulted in the concept of Riccarton Parklands a substantial and significant greenspace network that is proposed within these parts of the site.

The Flood Risk Technical Note also identified the opportunities to increase flood storage along the Murray Burn flood corridor to reduce the risk of flooding downstream of the site and within Edinburgh. This would include the lowering of land adjacent to the Murray Burn upstream of the Curriehill Station to store flood waters.

The Council's Housing Study (January 2020) also identifies that the site can be developed while avoiding flood risk areas to mitigate major flood risk, and that opportunity exists to incorporate these areas within development as part of the strategic green network. All these comments have been taken onboard and have helped shaped the proposals for Riccarton Parklands. Furthermore, any future planning application(s) would be supported by appropriate surface water management plans demonstrating the proposed biodiverse sustainable drainage system proposed.



## **Site 44. Alnwickhill Road**

### Juniper Residential Ltd (0786)

The objection specifically requests that the site at Alnwickhill Road should be removed from the Green Belt and Special Landscape Area, as proposed, and be designated as a housing site.

The site is 3.35 hectares (8.28 acres) of unused agricultural land. The site benefits from its close proximity and ease of accessibility to a range of facilities and services conducive to a high standard of sustainable retirement living including regular bus services on Liberton Brae and Liberton Gardens to the east providing access to all parts of the City; to shopping facilities and post office on Liberton Gardens; and to a range of recreational pursuits including golf, bowling, walking and cycling opportunities as depicted in the diagram accompanying.

The objection specifically requests that the subject site should be removed from the Green Belt and Special Landscape Area as proposed in the Plan and be designated as a housing site suitable for the development of retirement properties, a minimum 35% of which will be developed in affordable tenures. A Concept Plan has been prepared outlining the possible distribution of various uses within the site, which if allocated, could be formulated into a development brief. Key points to note are as follows:

- Area to west of Alnwickhill Road to be developed for residential properties (retirement housing) as a natural infilling of the site and benefitting from the strong landscaped defensible boundary to the south.
- The establishment of an area of public open space stretching from Liberton House to Liberton Drive. The precise nature and design of that open space area would be subject to future public consultation but would have a strong community emphasis.
- The establishment of a 'community facility' within the site which would significantly improve the quality and diversity of the area and contribute to the 20 minute neighbourhood concept advocated at various points throughout the proposed plan.

The site at Liberton Drive/Alnwickhill Road is, as noted previously, located within the Edinburgh Green Belt. The site is also located within a Special Landscape Area (Braids, Liberton and Mortonhall).

The inner boundary of the Green Belt, as presently defined by post and wire fences along the frontage of the site next to Alnwickhill Road and Liberton Drive, is visually weak in character and does not, in our opinion, provide a strong defensible boundary to the city nor enhance, in any way, its visual setting. The weakness referred to is exacerbated by the presence and No. 68 Alnwickhill Road which protrudes into the site with a strong visual presence. The outer boundaries of the subject site, noting in particular the strong strategic landscaping belt to the south combined with the buildings and trees/landscaping existing along the north western boundaries result in a defensible enclosure and an entirely natural location for development when viewed from both Alnwickhill Road and Liberton Drive. The redundant set aside agricultural land detracts further from the rural character of the area and results in a space offering little active or visual benefit to the area. The allocation of the site for a housing development would, in contrast, provide an opportunity to create a

meaningful and purposeful area of open space/community facility which would bring wider benefits to the entire area contributing, in the process, to the concept of the 20 minute neighbourhood.

Planning Advice Note 2/1010 on 'Affordable Housing and Housing Land Audits' was published by the Scottish Government in August 2010. According to Paragraph 55 of the circular a site needs to be free from the following types of constraints to be considered effective for housing development:

Ownership – the subject site being promoted for development is controlled by our client Cruden Homes/Juniper Residential - a nationally recognised house builder.

Physical – There are no constraints of a physical nature that would preclude the economic development of the site for residential purposes of the nature proposed.

Contamination – The site is redundant unkempt agricultural land and as such it has not been rendered unsuitable for the provision of marketable housing from the perspective of contamination.

Deficit Funding – The proposed development is economically viable without the assistance of any public funding.

Marketability – Our client's analysis of market conditions suggests that the proposed development is highly marketable due to the acute shortage of opportunities for housing and particularly retirement housing in Edinburgh.

Infrastructure - All infrastructure required to enable the proposed development to proceed is either in place or can be provided by our client.

Land use – It has been demonstrated within this statement that housing development is an entirely appropriate use for the subject site.

In view of the considerations outlined in this paragraph there are clearly no constraints on the subject site which would prevent its immediate development for housing.

The subject site has been promoted for allocation on a number of occasions previously. Whilst all previous attempts have been unsuccessful it is important to note and to give due weight to the fact that the site has been favourably considered by Scottish Government Reporters for release in earlier local plan reviews albeit at a time when such decisions/recommendations were not binding on the Council. Key points to note:

- The Reporter at the 2003 South East Edinburgh Local Plan (SEELP) Inquiry found and recommended that the site should be released from the Green Belt concluding that the existing green belt – the fence-line along Liberton Drive and Alnwickhill Road boundary was not particularly strong. In contrast, he concluded that the boundaries to the south and west, including the tree planting and Liberton House could form strong and defensible green belt boundaries.
- A similar view about the south and west boundaries of the site was also taken by the Reporter at the 1991 SEELP Inquiry. At that time there was a stone wall along the roadside edge of the site. It was concluded that this provided a good green belt

boundary, but it was also considered that tree planting to the west and south would satisfactorily contain the development and create defensible new green belt boundaries.

- The Edinburgh Green Belt Boundary Study of 1999 also identified the existing green belt boundary around the site as being weak. The report advised that where existing boundaries were found to be weak they should either be strengthened, for example through planting or be relocated to a new defensible line by extending or cutting back to a new defensible line.
- With regard to 'landscape setting', the Reporter at the 2003 Inquiry concluded that the allocation of this site would not affect the continuous green belt around the city. Whilst he concluded that development on the site would be visible from various locations on the higher ground to the south of the site, such as the Braid Hills and Stanedyehead it would be substantially screened by the woodland along the southern and western boundaries of the site. He further concluded that the greatest impact would be on views from Liberton Drive and Alnwickhill Road, where houses on the site would be visible in the foreground and most of the view to the attractive countryside beyond. However he considered that view to be, very much restricted by the woodland along the southern boundary of the site and would become more restricted over time as these trees grow.
- The Reporter at the 2003 Inquiry also concluded that the tree belt and the trees in the grounds of Liberton House would provide a backdrop to enable the landscape to absorb low rise family housing, that such development would not significantly adversely affect long range views and could, with appropriate additional landscaping, further strengthen the southern boundary of the site while at the same time having only minimal impact on the landscape setting of this part of the city.
- The Reporter to the 2003 SEELP Inquiry concluded that the area of the green belt to the west of Liberton House to be essentially urban in character and clearly not in keeping with the rest of the AGLV (Area of Great Landscape Value). He pointed out that Circular 2/1962 makes clear that an area proposed for an AGLV has to be considered in context and highlighted that the Liberton Drive site is more or less cut off from the remainder of the AGLV and cannot be said to form an integral part of a rugged hill landscape, as described in the EGBBS (Edinburgh Green Belt Boundary Study). He concluded that the site should be removed from the AGLV and that the boundaries of the AGLV should be redrawn to exclude the site adjacent commercial areas.
- The Council itself proposed housing development on the site in the Finalised Draft SEELP 1986. The Local Plan included a Development Brief for the proposed housing development, which included a brief description and indicative layout. The text specifically referred to landscape measures to be carried out along the western boundary to contain the development and "safeguard the setting of Liberton House."

The urban structure of the site, as presently existing, when viewed in conjunction with existing development to the west of the site, is ill defined. That is a view that has clearly been shared by a number of Reporters and also Planning Officials in the past.

Appropriately designed development including the provision of a strong edge along Liberton Drive, would simplify the landscape character of the area and would remove some of the visual confusion currently experienced when driving along Liberton Drive. Established views to the hills are already partly lost as a result of the landscape change that has occurred over the last 20-30 years, particularly the maturing of the woodland belt and the trees in the grounds of Liberton House, and will eventually be lost even without the development. Appropriately designed development on the site, would, in our opinion, as it has done so in the opinion of others before, provide a stronger urban edge and a

clearer more understandable transition from the urban to rural landscape. The site, in its unused and untidy condition, is not considered to be a locally important landscape feature worthy of protection and does not justify its inclusion within the Braids, Liberton and Mortonhall Special Landscape Area.

The following considerations add support for the identification/zoning of the lands for retirement housing purposes in the emerging local development plan:

- The population of Edinburgh is ageing with substantial increases in the retirement and over 75 age groups forecast. The emerging local development plan must address the demographic imperative of an ageing population and an existing housing stock that is ill equipped to deal with its needs.
- There are a number of benefits associated with the provision of housing for the elderly on the site.
- It will contribute to housing supply in the local housing market by providing desirable downsizing options for elderly residents thus addressing issues associated with under occupation and the freeing up of family homes for younger people in need of them.
- It will provide the area with which the site is located with a further beneficial community facility and in the process contribute to the concept of the 20 minute neighbourhood.
- Occupiers of sheltered housing developments report huge health benefits: including improvements to their quality of life generally; fewer visits to health professionals; and quicker recovery times following hospital stays.
- A higher quality of life for residents and their families.
- Greater security and convenience, and reduced feelings of isolation and vulnerability.
- Environmentally better than traditional housing, with reduced energy use, including less travel.
- Sustains local shopping and other services, helping to sustain local communities.
- Most residents have family and friends in the locality. Older people form an important part of the core of most communities with the Liberton Area being no exception.
- Whilst adapting housing or new build (mainstream) to Housing for Varying Needs provides specialized accommodation - this does not address the issue of isolation and loneliness which contribute greatly to adverse health in older people. Retirement living is managed and provides communal facilities that encourage a sense of community within the development.
- The site at Liberton Drive is suitably located for the provision of elderly housing in that it benefits from easy access to a range of facilities and services including public transport provision with bus routes existing along Liberton Brae and Liberton Gardens to the east.
- The development of the site for retirement accommodation places no burden whatsoever on the Council's education infrastructure.
- Given the extensive landscaping belt existing along the southern boundary of the site, combined with existing topographical considerations and proposed additional planting; the site can be visually contained, appear as part of the urban area and in the process contribute to the landscape setting of the city.
- The site, in itself, does not act as a buffer preventing the coalescence of Edinburgh with any other built up area and if removed from the Green Belt and designated for residential purposes (retirement accommodation) does not lead to the erosion or loss of a significant area of open space contributing to the purposes of green belt designation.

- The site is capable of accommodating a residential development of the nature proposed without adverse impact on the setting of Liberton House which can be protected and preserved with appropriate planting and landscaping proposals.
- The site has been favourably considered for development as part of the processes associated with earlier local plan reviews with Reporters suggesting that its release (on two occasions in the past) would contribute to rather than detract from the character and appearance of the landscape.
- The site is effective, free from constraints and immediately capable of beneficial development.

#### **Site 45. Land East of Mounthooley Loan**

##### Catchilraw Trust (0137)

There is an over reliance on non-deliverable/constrained brownfield sites that will lead to under-delivery of required quantum of new homes. There should be a blend of greenfield and brownfield sites to ensure a continual five year supply of a range of house types.

This lack of supply will ensure the lack of affordable housing delivery and further unsustainable house price inflation for open market homes.

In proposing development at Mounthooley Loan, there is an opportunity to develop land in accordance with the key policy themes throughout the document; sustainable, brownfield, accessible and affordable. The site is capable of providing a relatively low density development also identifying opportunities to reinforce a long-term landscape strategy for the area.

The Council's wider housing and landscape character assessments have taken a broad-brush approach missing key site characteristics that highlight a site for future appropriate development (in this instance, the brownfield element on the southern part of the site), making incorrect assumptions and subsequently discounting the site from future consideration as part of the City Plan process. Access could be taken from Frogston Road West although it is more likely that any future development would utilise existing accesses off Mounthooley Loan. The site benefits from good access to local public transport routes, benefitting from frequent bus services linking the site to the City Centre, Airport and Royal Infirmary etc.

To the east are further fields, leading to Mortonhall House, the Mortonhall Caravan Park (with associated year-round convenience shop) and Klondyke Garden Centre as well as the Mortonhall Cemetery and Crematorium. The site sits within the Edinburgh Green Belt, the Mortonhall Designed Landscape, and is designated a Special Landscape Area and Local Nature Reserve. Each of these designations covers a much wider area than this site alone and we challenge the appropriateness of these designations in the context of the site and its surroundings. It is not uncommon for allocation/designation boundaries to be established without individual site characteristics being taken into account.

The most southerly site consists of a former MOD camp (the disturbance can clearly be seen from the aerial images provided), with several areas of hardstanding and derelict buildings still evident on-site. This brownfield legacy and significant enclosure from surrounding uses (especially to the north and south) limits the role it can play as part of

the green belt, designed landscape and other designations, whilst simultaneously highlighting its development potential within the wider suburban context and meeting many of the Council's wider aims and objectives around brownfield development etc.

Such is the legacy of the military camp that the site cannot be used for arable or livestock farming. Its role either as a countryside use or contribution to the wider green belt is therefore limited.

The site is an effective and appropriate residential development site with no physical, technical or legal constraints to prevent short-term development; it would form an eastward extension of the existing, popular and marketable residential areas to the north of Frogston Road West (including the modern development on the site of the former Princess Margaret Rose Hospital).

Due to the existing boundary landscaping, the site has very limited visual impact on its surroundings. Distant views from the east and south (Edinburgh City By-Pass and Pentland Hills) are sufficiently distant as to be insignificant as part of a much wider panorama and the existing landscaping prevents views into and out of the site from the south (the main visual receptor direction).

Fundamental to the success of the Proposed Plan is the ability to identify appropriate and deliverable (effective) housing land. The City Plan has taken a strong line in allocating only brownfield development sites and there are huge question marks over the deliverability and effectiveness of the housing allocations. Many of the collocated sites have complex site characteristics as well as a range of ownership without confirmation of their availability for development.

Mounthooly Loan represents a part-brownfield site free of many of the constraints seen elsewhere. It passes many of the policy tests yet has been consistently ignored throughout this and previous LDP processes.

A failing of many Local Plans and Local Development Plans has been the translation of housing allocations on a map to actual development and the delivery of new homes to meet significant outstanding and pent up demand. The Proposed Plan will exacerbate the existing situation, will stifle development, increase pressure on land supply and affordability and will not see the delivery of the desired level of affordable housing (and despite the increased requirement from 25% to 35% of developments of 12 units or more). The plan does not allow for a range of development sites including a limited but much needed release of a number of greenfield sites that are effective, deliverable and require far less investment in infrastructure to ensure their short-term delivery. These sites will also create attractive places to live. Whilst larger sites will undoubtedly be required, the complexities of site assembly and delivery will inevitably mean that they will stretch over a longer time period, spanning Local Development Plan cycles. They will provide only a proportion (and quite possibly none) of the identified capacity. The Council should allow far greater flexibility to act as a catalyst and enable the market to recover/flourish as fast and as creatively as possible. By allocating further land for smallscale (and in this case high quality) development it creates a situation whereby the likelihood of the development being completed within the initial 5 year cycle is greatly increased, creating certainty around housing supply issue. The overarching aims of the LDP seek to grow the City's economy, provide more and better quality homes and to protect and improve our

environment for future generations. Each of these aims will be facilitated by allocating the site at Mounthooly Loan for housing.

The current and proposed Green Belt boundary is drawn tightly around Edinburgh's existing built environment. This prevents flexibility in both the implementation of the Green Belt policy and in the ability of existing developed areas to grow organically into appropriate neighbouring areas to meet increasing housing demand without the explicit need for major new allocations. In the case of the site at Mounthooly Loan, the Green Belt boundary has been established in such a way as to take no consideration of the context of the sites' characteristics and surroundings. The site is well screened from its surroundings, has different characteristics to the adjoining green belt areas, and has been previously developed. Once developed sympathetically, it would create a logical defensible boundary in this part of Edinburgh. Adjacent land to the south, north and east immediately takes on a more rural characteristic (despite being well within the Edinburgh City By-Pass) and links well with similar land to the South of Frogston Road West. There is no risk of coalescence if this site is removed from the green belt and it does not play a role in protecting or enhancing the "*quality, character, landscape setting or identity of the City*" (or neighbouring towns). The site plays no part in managing the long term shape of the settlement.

By relaxing the Green Belt Boundary at this location, it would help direct high quality development to a site that will sit comfortably in the context of adjacent residential surroundings whilst having no detrimental impact on the remaining green belt. In seeking the removal of this site from the Edinburgh Green Belt we are strongly advocating that the most appropriate use for this site is for residential development. Subject to the relevant planning permissions, The Trust in partnership with CALA, is seeking to develop this site in early course and certainly within the 5 year land supply cycle.

The site is well screened and though covered by a number of restrictive landscape designations, the site does not fulfil the objectives of these allocations being easily separated from surrounding land (through existing landscaping and brownfield characteristics). It would form an obvious and high quality eastern extension of the existing urban area, itself a modern high quality development (former Princess Margaret Rose Hospital) and does not fulfil the key functions of a green belt site.

The site would offer the Council a high quality and attractive alternative to a number of large allocations elsewhere across the City, the deliverability of which must be called into doubt due to infrastructure costs, site complexities and uncertainty over availability/willingness of landowners to sell develop. There will also be increasing problem associated with the displacement of existing businesses whose land has been identified for residential development (and not through their promotion for a change in land use).

Kim Denholm (0294)

Support the Plan's housing proposals. However, I remain very concerned that developers will exercise great pressure on Edinburgh Council to allow development along Frogston Road - both at Broomhills and at Mounthooly Loan. While I completely understand that Edinburgh Council has sought to protect these areas from further development, I strongly urge that steps are taken to guard against wildcat planning applications / appeals as developers and the Catchelraw Trust have made it very clear that they aim to progress their long term aims to build on both locations. This is unsustainable and would place an

intolerable extra strain on an already struggling infrastructure. Should developers make an appeal that goes against the Plan's recommendations, the detrimental effect from increased traffic pollution and subsequent poor air quality plus the harm to wildlife (of which there is a huge variety, including protected species such as bats and badgers) would be extreme.

While I also understand that CEC is not accepting petitions, I would like to make clear that I have an active petition against further development at Broomhills which currently stands at 1567 in the online version and approximately 250 paper signatures. This does give a very strong indication of the strength of feeling of both local residents and others who work and otherwise access the area.

#### **Site 46: West of Burdiehouse Road**

Gordon Henderson (0164)

The land at West of Burdiehouse Road should be removed from the Green Belt and shown as suitable for housing development.

The land in question lies on the western side of Burdiehouse Road directly opposite the new Barratt Homes development (The Limes). The land comprises an area of self-seeded trees and bushes that extends to just over 0.5 hectares. It is a linear area of land that is about c. 200 metres long and c. 35 metres wide, at its central point. The land is bounded by Burdiehouse Road to the east and by Old Burdiehouse Road to the west and north. The top third of the land is within the city boundary, with the remaining two thirds shown as Green Belt.

The land has no landscape or biodiversity designations; it is not within any defined floodplain. There are no heritage sites either within the land or close by. Access to the site is via Old Burdiehouse Road, which joins Burdiehouse Road immediately to the north of the land.

As it is proposed that the land is potentially identified for housing, then a key issue is whether it is 'effective'.

Planning Advice Note (PAN) 2/2010, 'Affordable Housing and Housing Land Audits', details seven criteria by which to assess how land can be considered as 'effective'. The seven criteria are assessed below.

- Ownership – The land is owned in its entirety by landowners who wish to see it developed.
- Physical - There are no significant aspect or ground stability issues known for this land. Access can be provided from Old Burdiehouse Road. Flooding is not an issue and drainage is capable of being resolved.
- Contamination – There are no known contamination issues on the land.
- Deficit funding – The site can be developed without the involvement of the public purse.
- Marketability – The Barratt Homes site opposite has proved successful and there is every reason to expect apartments on this site to sell well.
- Infrastructure - There are no known deficiencies in infrastructure provision for the site.
- Land use – Housing is the best use for this land.

The reason that apartments are likely to be preferred is because these can be designed in such a way as to mitigate the noise impact from Burdiehouse Road. This is partly why



Barratt Homes have built apartments fronting Burdiehouse Road themselves rather than houses.

The apartments opposite are c. 10 metres from Burdiehouse Road at their closest, are about 10 metres deep in plan form, and four storeys in height. A similar block could be built on this site whilst still complying with open space and car parking requirements. This would provide between 16 and 20 flats depending upon their size.

As for the Green Belt, this small area of land plays no particularly role in protecting the character of the city nor in preventing its coalescence with Straiton south of the A720. A new defensible boundary will instead become Old Burdiehouse Road.

With the new Barratt Homes housing on the eastern side of Burdiehouse Road already extending to the end of this site on the western side, there would appear no reason for not allowing this site to also be developed.

For those reasons, the land shown on the attached marked up version of the LDP Proposals Map can be removed from the Green Belt and shown as suitable for housing development.

#### **Site 47: Gogar Mount**

##### NatWest 0477

NatWest considers that there is scope to assess further its land to the south of RBS Gogarburn HQ and at Gogar Mount House for inclusion in City Plan 2030 as a housing-led mixed use development. The identification of this land for housing-led mixed use development will ensure a more balanced spatial strategy in the plan and help the Council deliver its required housing targets.

The character of West Edinburgh is expected to continue changing dramatically over the course of the City Plan period (to 2032) and beyond. Land immediately to the north of the A8 has already been removed from the green belt for mixed use development and in the proposed plan, the Council is proposing this area is developed to create new 'urban quarters' with a focus on housing-led, high density, mixed use development. The vision for West Edinburgh, as stated at para 3.56 of the proposed plan, is to become a vibrant, high density, mixed use extension to the city with a focus on place making, sustainability, connectivity, biodiversity and a strong landscape framework. Indeed, across West Edinburgh, the proposed plan allocates land for a significant number of new homes across Edinburgh 205 (7,000 units), now referred to as West Town; Crosswinds (2,500 units); land adjacent to Edinburgh gateway (250 units); land at Turnhouse SAICA (1,000 units); and Turnhouse Rd (200 units).

NatWest supports this changing character for West Edinburgh and welcomes the proposals for further infrastructure to support these developments including enhanced transport, cycle and pedestrian links which will help to ensure its existing headquarters remains accessible.

To the east of NatWest's Gogarburn, the proposed plan also acknowledges (at para 2.59) that changes are likely to be required to the green belt if Scottish Ministers grant planning permission in principle for the proposed development of land East of Milburn Tower. Ministers have resolved to grant planning permission in principle for this development,

subject to agreeing the S75. Accordingly, the proposed plan makes provision for a number of new measures to serve development at land East of Milburn Tower, including provision for a new primary school, and new bus and active travel routes.

Additionally, land to the west of RBS Gogarburn and referred to as 'Norton Park' was also assessed by the council as suitable for housing development in their earlier Choices document and identified as a potential site to be released from the green belt. While not carried into the proposed plan, it further emphasises the potential of West Edinburgh to accommodate further development and the changing character of this part of the city.

Indeed, West Edinburgh continues to be at the forefront of development planning for the city and Draft NPF4 recognises the importance of West Edinburgh stating:

"A strategy for West Edinburgh is emerging which guides a wide range of uses to create a sustainable extension to the city, with added benefit from associated improvements to the quality of place of existing communities. Proposals focus on locating development on and around existing transport corridors and work is ongoing to improve accessibility including the Edinburgh tram extension."

The principle of growth within the city's 'Strategic Development Areas' through green belt releases has therefore already been established at West Edinburgh and it is in this context of a changing West Edinburgh and the area becoming a new mixed use extension to the city, that we believe it is appropriate timing and the opportunity for the same approach to be taken to NatWest's land at Gogarburn. Accordingly, we request that the Gogarburn headquarters and land to the south of the Gogarburn headquarters and at Gogar Mount, shown on the attached plan, should be released from the green belt.

Land in NatWest's ownership to the south of its Gogarburn Headquarters and at Gogar Mount provides an opportunity to create a new sustainable mixed-use development and a high-quality place, and in doing so, make a significant contribution towards the Council's housing land requirements.

The identification of this land for new housing-led mixed used development would accord fully with City-Plan's infrastructure-first approach. The land is uniquely situated to be served by existing public transport infrastructure, including the Edinburgh Tram, and has good cycle links, providing easy access to the rest of the city. The site will also benefit from enhanced new bus corridors and active travel routes proposed to serve and support proposed development at West Edinburgh and potential development at land east of Milburn Tower, as referenced in the proposed plan.

Development of this land could include a mix of business related uses, a mix of residential types (including hotel and care home), together with other ancillary and community uses. In doing so, the site has the potential to deliver a high quality mixed use and walkable community which would support City Plan's planned vision of 20-minute neighbourhoods. This approach was recently reinforced by draft NPF4 (November 2021) which makes it clear that delivering housing land requirements should be consistent with the principles of 20-minute neighbourhoods and maximise the benefits of existing infrastructure. As well as offering the potential to deliver a mixed-use development itself, the site would be easily accessible to existing employment opportunities at Gogarburn, the Gyle and the Airport, existing retail and leisure facilities at the Gyle, and would also benefit from being in close proximity to mixed uses proposed at West Edinburgh.

Map 24 West Edinburgh under Place 16 (p.73) of the proposed plan demonstrates clearly that NatWest's RBS Headquarters and adjoining land to the south could integrate well with the wider West Edinburgh Proposals and also potential development at East of Milburn Tower, through both existing and proposed connections (vehicular and active travel routes). Promoting housing development at Gogarburn, adjacent to NatWest's office complex and adjacent to proposed development at West Edinburgh would deliver an integrated approach to housing, business and ancillary development and in doing so, deliver benefits in terms of quality of place and sustainable development objectives.

In our view, the land in question could also be sensitively developed without affecting the wider landscape setting of the city. Views to the site from the wider landscape are predominantly contained by intact woodland belts and development of the site would not impact upon views experienced by road users on the A8 and City bypass, both key approaches to the city, due to existing tree screening. The southern boundary of the A8 at Gogar Mount, the golf course, Gogarburn and Gogarbank are particularly well screened by existing tree planting.

While the site is more visible from roads to the south, these roads do not constitute key approaches and are more minor in nature. The terrain of the site also helps to conceal large parts of the site from such locations.

Views to parts of the site from the train line are screened by existing tree belts, and further tree planting could also help in this regard. The nature of the surrounding area is also likely to change by the potential development of land east of Milburn Tower which will also change the site's landscape context and how the site is viewed and experienced.

While it is considered that land to the South of Gogarburn could be promoted to start to bring forward new housing development before 2032, if the Council is not minded to include land within NatWest's ownership as a housing led development in the period of the Plan, we would encourage the Council to at least identify it as a long-term site. This approach is in line with Policy 9 of draft NPF4 which proposes that development plans should set out a deliverable housing land pipeline for the Housing Land Requirement based on short, medium and long-term sites which can be supported by the infrastructure requirements of the spatial strategy. Draft NPF4 specifically outlines that "locations that may be suitable for new homes beyond the plan period can also be identified. Where sites in the deliverable housing land pipeline do not progress to delivery as programmed and alternative delivery mechanisms are not possible, longer term deliverable sites should be brought forward."

Such an approach would further help to address our concerns regarding the deliverability of some housing proposals allocated in the proposed plan.

#### **Site 48: Peffermill**

##### University of Edinburgh (0464)

The Pleasance is a focus for the University's dry sports facilities, however increased demand has led to capacity issues. This has led to the need to explore the approach to additional investment in dry sports facilities at Peffermill as a key component of the Peffermill Sports Village.

The Peffermill Sports Village will be a beacon of the University's approach to health and wellbeing. It will provide a critical boost to the city's efforts to encourage and engage local citizens in health generating activities, and with a reach far greater than University staff and students. The proposed new development would also meet the aims of the 20 minute neighbourhood by providing a mix of uses that can benefit both University staff and students and the wider city, including the local community.

University of Edinburgh has proposals to upgrade the existing facilities at Peffermill, which currently provides areas of open space, that are accessible to the users of Peffermill. As part of these proposals the University of Edinburgh will provide increased accessibility to the site, which will include the local community, and not just the users of Peffermill.

New proposals for the sports village at Peffermill would also allow further public access into and through the site for all with the addition of new access points, walking and exercise routes into and around the site which will be available to site residents, users of the facilities and by the wider community.

The University of Edinburgh consider that if a proposed redevelopment of an outdoor sports facility involves the possible loss of some of the open space, this should be considered in the context of the gains that the new proposal will bring to the sports provision, and other communal open space. If there is the ability to rationalise and improve the sporting facility, and open space provision (in quality, rather than quantity), this should be supported by the City of Edinburgh Council.

The University of Edinburgh has a number of sites that provide high profile, excellent outdoor sports facilities, that are accessible to the University's students, along with the local community and national sports bodies. The University of Edinburgh is in support of the principle to maintain outdoor sports facilities and for example has proposals to upgrade the existing facilities at Peffermill. As part of these proposals the University of Edinburgh will maintain the majority of the site for sports provision, including making best use of the proposed new build elements to rationalise the sports facilities buildings.

New proposals for the sports village at Peffermill would also allow further public access into and through the site for all with the addition of new access points and walking and exercise routes into and around the site which will be available to site residents, users of the facilities and by the wider community.

The University recognise and support the importance of greenbelt to the spatial strategy of the city and to protect and support the unique qualities of the city and its landscape and scenic qualities. This support is, however, predicated on a need to maintain a degree of flexibility and in recognition of the need to assess site and location specific circumstances, and in the context of boundaries and designations that have existed for a considerable period and without detailed assessment to reflect the changing nature of the city.

In respect of the University estate the greenbelt designation is relevant to consider in the context of Peffermill and King's Buildings area.

Part 1 of the LDP sets out the purpose of the green belt. It is noted that Edinburgh's green belt plays an important role in directing the planned growth of the city and supporting regeneration.

It is noted that the green belt boundary is largely unchanged from previous local plans. The University of Edinburgh have concerns that the green belt has remained largely unchanged and consider that there should be scope for a review to be undertaken to ascertain if all allocated areas continue to meet the purpose outlined above, and importantly positively contribute to the stated purpose. It is understood that the last Green Belt report was undertaken in 2008. The review process should be undertaken at the earliest opportunity, and in the intervening period, the proposed plan should make provision for site specific assessments to be given weight and to inform policy and decision making.

Land at Peffermill sports campus is designated as Green Belt. According to the Green belt report (2008), the case for the special landscape qualities in the area was because of the proximity of the Craigmillar Castle setting. It is noted that the analysis provided in the 2008 green belt report did not refer to any of the intrinsic qualities of the Peffermill playing fields themselves.

The University of Edinburgh consider that areas of the Peffermill site do not contribute to role and purpose of the green belt. These areas are either already degraded through historic and current use, and / or have presented maintenance and intensity issues on a site gradient that impairs high quality sporting fixtures. Development of these areas would not create or contribute to coalescence and would be able to provide improved access to the areas of green belt that are protecting and giving access to open space. The University of Edinburgh question the need for areas of the green belt that are underused and no longer fit for purpose.

Peffermill is a key asset to the University and a vibrant campus location which is noted as a key focus for investment and enhancement of facilities. It is already a thriving location for sports, health and wellbeing, however, the current greenbelt designation presents a threat to the ability to maximise the benefits and potential of this location.

The plan should include measures which can allow challenge to the validity of maintaining the green belt designation, and to identify areas where selected development or enhancement of facilities may be appropriate, especially where this offers wider benefits in terms of wider environmental benefits and greenbelt enhancement, placemaking, health and wellbeing and community access and use.

It is submitted that a balanced view of the current green belt allocation in areas needs to take into account other needs, such as the provision of outstanding sports facilities, which in turn, are significantly important to the population's health and wellbeing.

Wider environmental objectives such as biodiversity, and the contributions to the city's green and blue network would exist if the particular area of land could be redeveloped.

#### **Site 49: Wisp**

##### Springfield Properties (0239)

Springfield Properties PLC is promoting a site of the south east of Edinburgh, identified as Wisp 4, for residential purposes.

In essence Springfield Properties is promoting the site to align the following aims and policy objectives within the emerging City Plan 2030:-

- Much needed homes
- Of which 25% are much needed affordable houses
- Provision of much needed local facilities serving the ever growing community within the wider Milligan Drive locale
- Investment to bring vacant land back into productive use
- Local jobs created including apprenticeships over the period of the development
- Funding towards the formation of the Little France Park through the South East Wedge/Little France Park Developers Contribution Zone
- Increase the East/West Connectivity through the addition of Springfield gifted land
- Houses near major employment, the Hospital, Bioquarter and the Medi-Park presenting an opportunity to provide accessible homes within walking/cycling distance of these large employment generating uses.
- The site is proven to be effective and deliverable, as per the requirements of PAN 2/2010, with Springfield committed to the delivery of this effective site which in turn will contribute to the housing land requirement for the City of Edinburgh.
- Residential development at this site would provide a wide range of economic benefits for the surrounding area both during its construction and occupation phases.
- Plan is fully reliant on sites that will prove challenging, if not impossible, to deliver during the plan period.
- The landscape character and quality of the site is greatly influenced by the cumulative impact of the planned developments at Greendykes and the BioQuarter. This will change from neglected open farmland to dense urban development.
- The proposed development will be part of this process of change. It will increase the urban edge of the city and this will be noticeable due to its location on rising ground.

A full justification and assessment of the potential landscape impact of the site is set out in a supporting document.

#### **Site 50: Lochend**

##### Aviagen (0365)

Aviagen would like the Proposals Map altered to remove the land they own on Lochend Road from the Countryside, as shown in red in the supporting statement so that it can be used for any use that is compatible with the location of this site under the Edinburgh Airport flight path, where development is anyway constrained by other policy and guidance.

#### **Modifications sought by those submitting representations:**

##### **Site: 1. Liberton Tower Mains**

##### Glenmorrison Group (0600)

Modify Plan to remove Liberton Tower Mains from the greenbelt and allocate site for housing for older people.

## **Site 2. Bankhead Steading: Queensferry**

Wight PDL (0078), Roseberry Estates (0618)

Modify plan to remove Bankhead Steading from the Green Belt and identified site for mixed business, nursery and tourism uses.

## **Site 3. Clerwood House**

The General Teaching Council for Scotland (0094)

Modify plan to remove Clerwood House from the green belt.

## **Site 4. Ransfield Farm Ratho**

Stewart Milne Homes (0118)

Modify plan to allocate Ransfield Farm site for housing development

## **Site 5. Land at Freelands Road**

BDW Trading (0678)

Modify plan to allocate land at Freelands Road for housing development

## **Site 6. North of Ratho**

Taylor Wimpey (0770)

Modify plan to remove North of Ratho from the green belt and allocate the site for housing development.

## **Site 7. Baird View, Ratho**

Tarmac (0244)

Modify plan to allocate Baird View for housing development.

## **Site 8. Craigiehall Estate**

Hallam Land (0615), Defence Infrastructure Organisation (0124), Defence Infrastructure Organisation (0665)

Modify Plan to remove Craigiehall site from the green belt and allocate the site for redevelopment.

Modify Plan add a specific placed based policy for Craigiehall within Proposed City Plan 2030 with the following criteria:

- Preparation of a masterplan.
- A development which respects the heritage of the site and provides a sustainable long term use for the listed buildings on site.
- Retention and enhancement of existing landscaping framework to protect the character of and setting of the Inventory Garden and Designed Landscape.
- Use site layout and green-blue infrastructure to connect to and enhance surrounding green networks and natural habitats.
- Interpretation of the site's military history within the new development.
- Removal of the security fence around the site.
- Provide or contribute towards education, and healthcare infrastructure and community facilities as might be appropriate.

### **Site 9. Craigcrook Road**

Cala Management (0180) / Calex Group Ltd (0556)

Modify Plan to remove Craigcrook Road from the green belt and allocate the site for housing.

### **Site 10. Hermiston Park (East of Riccarton)**

Murray Estates (0197)

Modify Plan to remove Hermiston Park from the green belt and allocate the site for housing.

### **Site 11. Ratho Station East**

Murray Estates (0197)

Modify Plan to allocate site for housing development.

### **Site 12. East of Milburn Tower**

Murray Estates (0197)

Modify Plan to allocate site for housing development.

### **Site 13. The Drum and Drum(2)**

SEEDCo (0198)

Modify Plan to allocate the Drum for housing development.

Modify Plan to allocate the Drum (2) for housing development.

### **Site 14. South East Edinburgh**

T Klan (0307)



Modify Plan to allocate South East Edinburgh for housing development.

**Site 15. Almondhill Kirkliston**

BDW Trading and Taylor Wimpey (0199)

Modify Plan to allocate Almondhill for housing led uses.

Sir Jack Stewart-Clark (0800)

No specific modification identified.

**Site 16. East Kirkliston**

Miller Homes and Wheatland Farming Partnership (0592)

Modify Plan to allocate Kirkliston East for 2,700 houses and mixed use development.

**Site 17. Muirwood Rd**

Taylor Wimpey (0200)

Modify Plan to allocate site at Muirwood Road for housing development and remove it from the green belt.

**Site 18. Curriemuir Vale**

Cala Management (0316)

Modify plan to remove Currievale from the green belt and allocating it for housing development.

**Site 19. Bankhead, Balerno**

Simon Thompson (Glenpark Homes) (0248)

Modify Plan to add new housing allocations at Bankhead, Balerno

**Site 20. Glenbrook Rd. Balerno**

Simon Thompson (Glenpark Homes) (0248)

Modify Plan to add new housing allocation at Glenbrook Road, Balerno

**Site 21. Land at Goodtrees**

Hallam Land (0615)

Modify Plan to allocate new site at Goodtrees for housing development.

**Site 22. South of Cockburn Crescent**

Barratt David Wilson Homes (0677)

Modify Plan to allocate new site south of Cockburn Crescent for housing development.

**Site 23. Highfield**

Taylor Wimpey (0200)

Modify plan to allocate new site at Highfield for housing development and remove from green belt.

**Site 24. Frogston Road East**

BDW and Catchelraw Trust (0209), Bo Adams (0363)

Modify plan to allocate new site at Frogston Road East for housing development.

**Site 25. Alnwickhill Road**

MacTaggart and Mickel Homes (0312)

Modify plan to allocate new site at Alnwick Road for housing development.

**Site 26. Calderwood**

Stirling Developments Ltd. (0303)

Modify Plan to allocate new site at Calderwood for housing development

**Site 27. North of West Craigs**

West Craigs Ltd. & Dunedin Canmore (0352)

Modify Plan to allocate new site at North of West Craigs for housing development and remove it from the green belt.

**Site 28. Cammo Fields**

Dunedin Canmore HA (0766)

Modify Plan to allocate Cammo Fields site for 100% affordable housing.

**Site 29. Land at Burdiehouse**

Hallam Land (0457)

Modify Plan to allocate land at Burdiehouse for housing development.

**Site 30. Land at Burdiehouse Rd**

Azad Murdochy (0361)

Modify Plan to remove designation of the site under Policy Env 21 as a Local Nature Conservation Site and allocate site for affordable housing.

**Site 31. Hatton Village (Hatton Mains)**

Inverdunning (Hatton Mains) Ltd (0427)

Modify Plan to allocate land at Hatton Village for housing development.

**Site 32. New Liston Road, Kirkliston**

Robertson Residential Group (0537)

Modify Plan to allocate land at New Liston Road for housing development.

**Site 33. Norton Park**

Taylor Wimpey and Hallam Land (0603)

Modify Plan to allocate land at Norton Park for housing development.

**Site 34. Lennie Cottages**

Roseberry Estate (0618)

Modify Plan to remove Lennie Cottages site from Greenbelt and allocate for housing as a stand alone development.

**Site 35. Lang Loan**

Miller Homes Ltd (0649)

Modify Plan to allocate land at Lang Loan for housing development and remove the site from the green belt.

**Site 36. Land south of Murrayfield Hospital**

Spire Healthcare Ltd (0719)

Modify Plan Seek to allocate land at Murrayfield Hospital for residential development for housing for older people / specialist housing or a care home.

**Site 37. Land east of Winton Gardens**

Esk Property LLP (0726)

Modify Plan to allocate land east of Winton Gardens for an age restricted development comprising assisted living, retirement (over 55) accommodation and care facilities.

**Site 38. Land at Baberton Road**

Stoddart Family (0749)

Modify Plan to allocate land at Baberton Road for housing development.

**Site 39. Edge of Edmonstone Estate**

Scottish Enterprise (0760)

Modify Plan to allocate land at Edmonstone Estate for housing development and remove the site from the green belt.

**Site 40. Lanark Road West**

John Brady (0353)

Modify Plan to remove land at Lanark Road West from the green belt and allocate the site for housing development.

**Site 41, Land south of Gilmerton Station Road**

MacTaggart and Mickel Homes (312)

Modify Plan to remove land south of Gilmerton Station Road from the green belt and allocate the site for housing development.

**Site 42. East Foxhall**

Landowner of East Foxhall (0544)

Modify the Plan to remove land at East Foxhall from the green belt and allocate the site for housing development.

**Site 43. Riccarton Village**

Miller Homes (0256)

Modify the Plan to remove land at Riccarton Village from the green belt and allocate the site for housing led development.

**Site 44. Alnwickhill Road**

Juniper Residential Ltd (0786)

Modify the Plan to remove the land at Alnwickhill Road from the green belt and allocate the site for housing suitable for retirement properties.

**Site 45. Land East of Mounthooley Loan**

Catchilraw Trust (0137)

Modify the Plan to remove the land East of Mounthooley Loan from the green belt and allocate the site housing development.

**Site 46: West of Burdiehouse Road**

Gordon Henderson (0164)

Modify the Plan to remove the land at West of Burdiehouse Road from the Green Belt and allocate the site for housing development.

**Site 47: Gogar Mount**

NatWest 0477

Modify the Plan to remove land south of Gogarbank from the green belt and allocate the site for housing led mixed use development.

**Site 48: Peffermill**

University of Edinburgh 0464

Modify the Plan to support proposals for a new sports village at Peffermill and remove the area from the green belt.

**Site 49: Wisp**

Springfield Properties 0239

Modify the Plan to allocate the site at the Wisp for housing development.

**Site 50: Lochend**

Aviagen (0365)

Modify the Plan to remove the site from the countryside.

**Summary of responses (including reasons) by planning authority:**

**Housing Position Statement**

A key aim (Aim 2) of the Plan is to direct new development to, and maximise the use of brownfield land rather than greenfield land. Where greenfield land has been identified for housing development it is in the context of delivering housing led mixed use development on sites previously identified for development, re-envisioning the allocated sites in terms of the mix and balance of uses, i.e. West Edinburgh. The Council considers there is no need for additional greenfield land to be identified for development. The Council considers there is an adequate provision of housing land supply, that there is a range of types of sites identified e.g. large, small, brownfield and greenfield etc, that proposed densities can be achieved and allocated sites are considered deliverable in the period of the plan. The Council sets out its position in relation to these issues in detail in Issue 20: Assessment of Housing Land Supply, and Issue 12: Density.

The Council is of the view that Choices set out a sufficient consultation on options for development of West Edinburgh as identified through both the text and mapping of Choices and also through the Housing Study (CD026) and Appendix D. In addition, responses to the Choices consultation included reference to the potential for the type of development set out in the Proposed Plan, demonstrating how people understood what was being proposed. As a result, the Council considers the proposals as reasonable and justified. The Council sets out its position in relation to these issues in detail in Issue 39: Consultation.

The City Plan Housing Study (CD026) prepared by the Council was used to inform the preparation of Choices for City Plan 2030 (CD022). An assessment of all greenfield land was undertaken to assess which land had development potential while still contributing to the SDP1 spatial strategy, minimising the effect on landscape character and making best use of existing infrastructure. The methodology (Part 2b, Figure 1, p3) was prepared to allow sites to be assessed in a consistent manner and to enable sites to be subject to comparative analysis. The results of this work allowed the Council to identify its preferred greenfield sites, should some be required to meet housing requirements. However, the Council considered the most sustainable option was its preferred approach at the MIR stage, that new allocations to support the housing land supply should be directed to brownfield rather than greenfield sites. As noted above and considered in Issues 19 and 20, the Plan identifies sufficient sites to meet its housing target and land requirement. As a result, none of the greenfield locations analysed were identified in the Proposed Plan.

### **Site: 1. Liberton Tower Mains**

#### Glenmorrison Group (0600)

The proposed Liberton Tower Mains site is within the Edinburgh Green Belt and a Special Landscape Area.

The Liberton Tower Mains site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology and the results are on p47. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 2, within the West of Liberton Brae area. The Housing Study found that this area had poor access to the wider cycle network, and is unlikely to be improved, that the site has limited support for public transport, that there was no scope for development because of its visual prominence in the landscape and its importance for the setting of the Braid Hills and the city, which is characterised by open arable farmland that is highly visible from Holyrood Park and other elevated viewpoints. This area also forms an important part of a wider green network. It contains features of biodiversity value e.g. hedge, trees, habitat mosaic on the urban edge, and should be retained as part of a larger open space and greenbelt zone with biodiversity value.

The representation site forms a small part of the overall assessment area. The introduction of urban development would impact on the contribution this farmstead and its rural setting make to green belt objectives. The site sits apart from the dense urban edge of Liberton and lacks features readily able to provide an alternative green belt boundary.

The Council's position on elderly care housing is addressed in its response in Issue 26 Student Accommodation. The Council does not agree that there is a need to identify housing for older people on the Liberton Tower Mains site.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 2. Bankhead Steading: Queensferry**

Wight PDL (0078), Roseberry Estates (0618)

The proposed Bankhead Steading site is within the Edinburgh Green Belt.

The Council considers the loss of employment land as a result of the Plan's strategy is not as significant or extensive as alleged in the representations. The Council considers it has provided sufficient land to accommodate the needs of any businesses having to relocate. The Council has identified land for displaced businesses within Business and Industrial land which is covered by Policy Econ 4. Therefore, Policy Econ 2 does not apply. The Council's position on these matters is set out in detail in its responses in Issue 2: Spatial Strategy and Issue 3: Delivery of the Strategy. As a result, the Council does not consider there is a need to identify the greenfield site at Bankhead Steading for a business allocation.

The Bankhead Steading site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology and the results are on p284. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 6, within the East of Dalmeny area. The area is not within walking distance of local convenience clusters. The area does not have access to the wider cycle network and is not considered to support active travel overall. It also does not support travel by public transport and therefore is likely to encourage car based trips contrary to outcome of the Plan where you don't need to own a car to move around. Finally, the study concludes that there is no scope for development in this area due to its importance for the setting of south Queensferry.

Development would impact adversely on the character of the farmland of scenic quality, contributing to the landscape setting and separate identities of South Queensferry and Dalmeny village.

It would breach Queensferry's wooded eastern edge and lacks features readily able to provide an alternative green belt boundary.

As a result, the council does not consider there is justification for the allocation of this site for a mixed business uses development. **No modification proposed.**

### **Site 3. Clerwood House**

The General Teaching Council for Scotland (0094)

Clerwood House is within the green belt, a special landscape area, a local biodiversity site, a local nature conservation site and part of Corstorphine Hill open space.

The site is within the Sector 7 Corstorphine Hill assessment area (p341) which stated, “No scope is identified for development in this area due to its landform, distinctive woodland and remnant parkland forming a key part of the setting and skyline of Edinburgh, valuable greenspace, Special Landscape Area and Local Nature Reserve.” The representation site forms a small part of the overall assessment area, however, through its mature trees and open lawns, the grounds of Clerwood House contribute to Green Belt objectives by maintaining Corstorphine Hill’s character as a visually prominent wooded ridge providing a landscape setting within the city.

As this site is a Local Nature Conservation Site and adjacent to Corstorphine Hill Local Nature Reserve it is an important component of the wider ecological site, with mature trees and woodland edge mosaic habitats which connect and extend the main woodland area.

As a result, the Council does not consider there is justification for removing this site from the green belt. **No modification proposed.**

#### **Site 4. Ransfield Farm Ratho**

Stewart Milne Homes (0118)

The Ransfield Farm site is within the greenbelt and is adjacent to a Local Biodiversity site (Union Canal).

The Ransfield Farm site at Ratho was not identified as a preferred location in the Council’s Housing study as it did not score well under the assessment methodology, the results are on p186. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the South of Ratho area. The Housing Study found the area was not within walking distance of employment clusters and that whilst there could be access to the wider cycle network, it is impeded by the Union Canal cycle path; that route is considered to be at capacity. It is unlikely to be improved as capacity cannot be increased here due to it being a canal tow path and a scheduled monument, and no other suitable cycle route interventions have been identified which could serve the site; therefore it concluded that the cycle network is unlikely to be improved by an identified intervention. Public transport provision was also considered poor and that intervention within the plan period was not considered deliverable. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don’t need to own a car to move around.

The site forms a small part of greenfield sector 5. Whilst some scope for development was identified to the south of existing housing, development of the site would impact on the settlement’s open setting to the east and southward views from the Union Canal and towpath.

Woodland at Ratho Park Golf Course could form an alternative green belt boundary to the east, however, woodland planting would be required to provide a new and firm edge to settlement to the south.

As a result, the council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 5. Land at Freelands Road**



### BDW Trading (0678)

The site at Freelands Road is within the Green Belt and is adjacent to a Local Biodiversity site (Union Canal).

The Freeland Road site at Ratho was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology and the results are on p182. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the Ratho Byres area. The Housing Study found the area was not within walking distance to local convenience services and that whilst there could be access to the wider cycle network, it is impeded by the Union Canal cycle path; that route is considered to be at capacity. It is unlikely to be improved as capacity cannot be increased here due to it being a canal tow path and a scheduled monument, and no other suitable cycle route interventions have been identified which could serve the site; it concluded that the cycle network is unlikely to be improved by an identified intervention. Public transport provision was also considered poor and that intervention within the plan period was not considered deliverable. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. Finally, the area is considered to have no scope for development due to the openness of the landscape limiting the opportunity to create a new firm settlement boundary.

The introduction of development would impact on the rural setting to the northeast of Ratho and the Union Canal from which scenic northward views can be enjoyed.

The existing green belt boundary is robust, formed by thick planting and a steep banking (made ground/former landfill site). Aside from the Canal to the south, the site lacks features readily able to provide an alternative green belt boundary to the north and east.

As a result, the council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 6. North of Ratho**

#### Taylor Wimpey (0770)

The site North of Ratho is within the Edinburgh Green Belt.

The North of Ratho site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology and the results are on p249. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the Norton Mains area. The Housing Study found the area was within walking distance to employment clusters but access was impeded by a poor walking environment, that although the area does have access to the wider cycle network access is impeded by the Union Canal path which is at capacity and unlikely to be improved due to it being a canal tow path and a scheduled monument. Public transport provision was also considered poor and that intervention within the plan period was not considered deliverable. Therefore, it is likely to encourage car based trips contrary to outcome of the Plan where you don't need to own a car to move around. Finally, the area is considered to have no scope for development as any development would be visually

prominent in long views from the M8, more open sections of the Union Canal and parts of Ratho, and would conflict with the linear settlement pattern of Ratho.

The site undulates to the west and whilst the highpoint could be retained as open space, the additional height of development elsewhere on site would remain prominent.

Aside from the M8 to the north, the landscape to the east is open and lacks features readily able to provide an alternative green belt boundary.

As a result, the council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 7. Baird View, Ratho**

#### Tarmac (0244)

The site Baird View is within the countryside policy area, and part of the site is within a special landscape area.

The Baird View site at Ratho was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology and the results are on p184. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the Arbor Lodge area. The Housing Study found the area was not within walking distance to employment clusters and unlikely to be improved, that although the site does have access to the wider cycle network access is impeded by the Union Canal path which is at capacity and unlikely to be improved due to it being a canal tow path and a scheduled monument. Public transport provision was also considered poor and that identified intervention would not support travel by public transport. Therefore, it is likely to encourage car based trips contrary to outcome of the Plan where you don't need to own a car to move around. Finally, the area has some limited scope for development on the northern part of the area where it is more visually discrete, despite some conflict with the linear settlement pattern of Ratho. But the remainder of the area, incorporating the ridge and south-facing slopes are an important well-wooded component of the settlement of Ratho. Any development in these locations would impact adversely on the character of hills and ridges which enclose and contribute to the visually prominent setting of Ratho as viewed from its historic core and the Union Canal.

As a result, the council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 8. Craigiehall Estate**

#### Hallam Land (0615), Defence Infrastructure Organisation (0124), Defence Infrastructure Organisation (0665)

The site at Craigiehall is an established use within the green belt, a historic garden/designed landscape, part of the site is within the airport public safety zone, and part of the site is within an area of importance for flood management. The site was formerly used by the MOD.

The Craigiehall Estate site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p268. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 6, within the Craigiehall area. The Housing Study found the area was not within walking distance of local convenience services, apart from Craigiehall Farm shop which cannot provide an appropriate level of amenity, this is unlikely to be improved and the site is also not within walking distance of employment clusters and that is unlikely to be improved. The study found that the area had partial access to the cycle network but would not support active travel overall. Public transport provision was also considered poor and identified interventions would not support travel by public transport. Therefore, it is likely to encourage car based trips contrary to outcome of the Plan where you don't need to own a car to move around. Finally, no scope was identified for major development in this area due to its contribution to the setting and character of North-West Edinburgh, with its highly visible location as seen from the A90, Craigie Hill and the B9080 and any development breaching the robust settlement boundary formed by the River Almond valley. The study noted the existing MOD housing on the site and considered there may be some limited scope for low density housing to replace the existing MOD buildings only. Any limited development would need to be accompanied by restoration of the designed landscape, including the parkland, trees and woodlands.

Craigiehall contributes to the range of policy landscapes providing a high-quality landscape setting to the northwest of Edinburgh. Extensive development in this location would breach the robust settlement boundary provided by the River Almond.

The Council recognises the previous use of the site by the MOD and considers there is some scope for a modest development to replace or reuse the existing low density housing, however, it does not consider there is scope for a major housing development due to the lack of accessibility to active travel and public transport which is likely to result in increased car based travel contrary to the objectives of the plan.

Part of the site is within the airport public safety zone. This in combination with noise issues associated with the airport, means that it is likely to be difficult to achieve a satisfactory layout and adequate levels of amenity for future residents.

As a result, the council does not consider there is justification for the allocation of this site for housing development nor for an associated place policy.

The Council has prepared an Environmental Report that carries out a strategic environmental assessment of the plan and its strategy. The Council has not received any significant criticism of the assessment approach adopted or the findings of the report by the consultation authorities (Nature Scot, Historic Environment Scotland, and Scottish Environment Protection Agency).

The Council Commissioned Ryden to prepare the Edinburgh Commercial Needs Study: Mixed Use Delivery report (CD036) to update the 2018 Commercial Needs Study: Industrial Property Market report (CD035) and to consider the impacts of Option 1 of Choices for City Plan 2030. Option 1 was to deliver all development within the urban area. The Council considers the findings of the report helpful for its purpose of understanding the overall implications of the Plan's development strategy in terms of its impact on employment land. The Council's view is that the approach and policies set out in the Plan seek to minimise the loss of employment uses and is expected to have positive benefits overall compared to

the existing policy position set out in the adopted LDP. The impacts of the specific developments on employment land will be considered at the time of proposals coming forward. In addition, the Council considers that the use of CPO powers is unlikely to be required. The Council sets out its position in detail on these matters in its responses in Issue 3: Delivery of the Strategy. **No modification proposed.**

### **Site 9. Craigmock Road**

Cala Management (0180), Calex Group Ltd (0556)

The site at Craigmock Road is within the green belt, a special landscape area, a local nature conservation site, a local biodiversity site and an area of open space.

The Craigmock Road site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p331. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 7, within the Craigmock Road area. The Housing Study found the area did not have access to the wider cycle network and this was unlikely to be improved. Public transport provision was also considered poor and that identified intervention would not support travel by public transport. Therefore, it is likely to encourage car based trips contrary to outcome of the Plan where you don't need to own a car to move around. Finally, no scope was identified for development in this area due to its distinctive parkland character which features mature trees covered by a TPO, its contribution to the scenic parkland character of Corstorphine Hill, its contribution to views to and from Corstorphine Hill, steeply sloping topography and its designation as an SLA.

This site is a Local Nature Conservation Site and adjacent to Corstorphine Hill Local Nature Reserve. It is an important component of the wider ecological site, with mature trees and woodland edge mosaic habitats which connect and extend the main woodland area. This type of parkland grazing habitat is uncommon in Edinburgh and of biodiversity value.

Whilst the proposal includes green space provision and path access to Corstorphine Hill, to enable development, the steeply sloping ground is likely to require substantial building platforms and retaining walls, which may be visually intrusive and impact on tree protection.

As a result, the council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 10. Hermiston Park (East of Riccarton)**

Murray Estates (0197)

The site at Hermiston Park is within the green belt, there is a scheduled ancient monument, an area of importance for flood management, and there is a local biodiversity site within the development (Union Canal). In addition, part of the site is within a designated conservation area.

The Hermiston Park site covers a large area. It is within Sector 5 of the Housing Study. The majority of the site is within East of Riccarton area and a small part is within South of

M8 area. The East of Riccarton area was identified as a preferred site in the study if greenfield housing sites were required. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

The small part of the site that is within South of M8 did not score well under the assessment methodology; the results are on p163. Although the assessment area covers a larger area than proposed for development, the Council considers the findings are still relevant to all parts of the area. Although the area does have access to the wider cycle network access this is impeded by the Union Canal path which is considered to be at capacity, which is unlikely to be improved because it is a canal tow path and scheduled monument. Public transport provision was also considered poor and identified intervention would not support travel by public transport. With regard to landscape, the study identified scope for development within the East of Riccarton area. Whilst the area is visually prominent, it is influenced by the urban edge and other infrastructure and is of less rural character. Development would breach the robust boundary of the City Bypass, which could limit integration with the existing urban area, though Riccarton campus and Baberton Golf Course could provide the basis of a green belt boundary, strengthened by planting and wider landscape mitigation. Undergrounding of overhead lines would be required. In the area South of M8, no scope for development was identified due to its more strongly rural character of open rolling farmland which forms a setting for the Union Canal and contributes to the setting of Hermiston Conservation Area and 19<sup>th</sup> century villas set in wooded grounds. The area lacks robust features to the west to provide an alternative green belt boundary.

In the northeast of the area, the Union Canal runs in a dip in this location which limits views out from the water and towpath. Limited scope exists for small clusters of housing reflecting the character of existing settlement or on brownfield land.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 11. Ratho Station East**

#### Murray Estates (0197)

The site at Ratho Station East is within the green belt, and part of an area safeguarded for the potential relocation of the Royal Highland Centre.

The site is within sector 1 of the Housing Study and is part of the West Edinburgh area which was identified as a preferred greenfield site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan. Strategic enhancement of Edinburgh Airport, which includes safeguarding this site for the possible relocation of the showground, is a national development identified in NPF3. While draft NPF4 does not continue the national development designation, until the approval of NPF4 it is considered appropriate that the site is safeguarded for the possible relocation of the Royal Highland Centre.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 12. East of Milburn Tower**

#### Murray Estates (0197)

The site at East of Milburn Tower is within the green belt. Within the site is an area of importance for flood control, a special landscape area and a local nature conservation site.

At the time the Plan was published the Scottish Ministers had yet to approve an application for planning permission in principle for the site. The Council took a decision not to formally allocate the site in the Plan, and retain it within the green belt, unless the proposal was approved. However, it should be noted that the site was factored into the housing land requirement calculation. The proposal has now been granted permission and should the Reporter consider it appropriate the Council would have no issue with identifying the site within the Plan in Table 2 and on the Proposals Map.

### **Site 13. The Drum and Drum (2)**

#### SEEDCo (0198)

The Drum site and its inclusive Drum (2) site are within the green belt. Part of the Drum site, including the Drum (2) site are within a special landscape area. Within the larger Drum site is also a Historic Garden/Designed Landscape, a Local Biodiversity Site and a Local Nature Conservation Site.

The site is within sector 2 of the Housing study and comprises the Drum North and Drum South areas which were identified as preferred sites in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of these sites for housing development. **No modification proposed.**

### **Site 14. South East Edinburgh**

#### T Klan (0307)

The South East Edinburgh site is within the Green Belt. Within the site is a Special Landscape Area, a Historic Garden/Designed Landscape, a Local Biodiversity Site and a Local Nature Conservation Site.

The site is within sector 2 of the Housing study and comprises the South East Edinburgh area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 15. Almondhill, Kirkliston**

BDW Trading and Taylor Wimpey (0199)

The Almondhill site at Kirkliston is within the Green Belt. Within the site is a Local Nature Conservation Site and a Local Biodiversity Site.

The site is within sector 6 of the Housing study and comprises the Kirkliston area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 16. East Kirkliston**

Miller Homes and Wheatland Farming Partnership (0592)

The East Kirkliston site is within the Green Belt. Within the site is a Local Nature Conservation Site and a Local Biodiversity Site.

The site is within sector 6 of the Housing study and comprises the Kirkliston area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 17. Muirwood Road**

Taylor Wimpey (0200)

The Muirwood Road site at Currie is within the Green Belt.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p168. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the Baberton area. The Housing Study found the area is within walking distance of employment clusters but access is impeded by the poor walking environment along Riccarton Mains Road. The area has access to the wider cycle network but that is impeded by the Water of Leith path which is poorly overlooked, unlit and unsuited to

everyday journeys. In addition, upgrading the route without significant impact on the ecology of the area is considered unlikely and highly challenging. Public transport provision was also considered poor and identified intervention would not support travel by public transport. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. The Housing study methodology allows a comparative analysis of sites. The public transport accessibility level (ptal) analysis in the study takes account of number of services and frequency of those services. As a result, although the site has a 10 minute bus service at present, it does not necessarily means it scores well under ptal and therefore the number of public transport services available to the site is limited. The analysis is not implying there is no access to public transport, but it demonstrates that public transport accessibility is poor compared to other parts of the city. With regard to the rail station, it is located 2km from the centre of the site and therefore not considered very accessible in terms of walking distance. The study found there was some scope for development in this area due to it being visually contained, with existing housing and woodland providing opportunity to form robust new settlement edges but that overhead power lines form a constraint to development here. Overall, the study concluded the area was not suitable for development due to poor public transport accessibility.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 18. Curriemuir Vale**

#### Cala Management (0316)

The Curriemuir Vale site at Currie is within the Green Belt.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, and covers three areas of analysis; Currievale, Weavers Knowe and East of Riccarton Mains Road. The results are on p170/1, p180/1, p247/8 . The Currievale area covers the majority of the site. The Housing Study found this area is within walking distance of employment clusters but access is impeded by the poor walking environment along Curriehill Road, and that the area has access to the wider cycle network but access is impeded by the Water of Leith path which is poorly overlooked, unlit and unsuited to everyday journeys. In addition, upgrading the route without significant impact on the ecology of the area is considered unlikely and highly challenging. Public transport provision was also considered poor and that identified intervention would not support travel by public transport. It should be noted that train services are included within the analysis. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. The Housing Study concluded that the area was not suitable for development due to its poor public transport accessibility. The Housing Study concluded that the Weavers Knowe area also had poor public transport accessibility, and it also considered there was no scope for development as it was likely to require the removal of the mature trees present on the site, adversely affecting this key part of the landscape setting. Finally, with regard to the East of Riccarton Mains Road area the Study similarly concluded the site had poor public transport accessibility.

The three greenfield assessment areas have distinct landscape and visual characteristics.



Some scope for development was identified at Currievale, being visually contained and forming a robust boundary to development to the north against the rail line, however, overhead power lines would constrain development.

No scope for development was identified at Weaver's Knowe, due to development requiring removal of existing mature trees forming the landscape setting to the Murray Burn.

Scope for development was identified at East of Riccarton Mains Road with screen planting on the low hill to the south of the site, however, overhead powerlines would constrain development.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 19. Bankhead, Balerno**

Simon Thompson (Glenpark Homes) (0248)

The Bankhead site is within the green belt and Pentlands Special Landscape Area. It comprises former agricultural land and buildings.

The Bankhead site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p148. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 4, within the Bankhead House area. The Housing Study found this area not to be within walking distance of local convenience services or employment clusters. It was found to have poor access to the wider cycle network and public transport and was unlikely to be improved. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. The area was also considered to have no scope for development due to its importance for the setting of Balerno and the Pentland Hills and position to the west of the robust settlement boundary formed by mature woodland along Cockburn Crescent. As a result, the Housing Study concluded that the area was not suitable for development. Although the site comprises a series of existing agricultural buildings and open space the Council does not consider this justification for supporting housing development on this site.

The site forms a small part of the greenfield assessment area. To avoid impacts in order not to detract from the wider landscape character and scenic quality of the area, only a limited extension to the existing converted steading of corresponding scale, height and form would be appropriate.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 20. Glenbrook Road, Balerno**

Simon Thompson (Glenpark Homes) (0248)

The Glenbrook Road site is within the green belt and Pentlands Special Landscape Area.

The site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p148. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 4, within the Bankhead House area. The Housing Study found this area not to be within walking distance of local convenience services or employment clusters. It was found to have poor access to the wider cycle network and public transport and this was unlikely to be improved. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. The area was also considered to have no scope for development due to its importance for the setting of Balerno and the Pentland Hills and position to the west of the robust settlement boundary formed by mature woodland along Cockburn Crescent. As a result, the Housing Study concluded that the area was not suitable for development.

The site forms a smaller part of the greenfield assessment area but contributes to the rural setting of Balerno and the Pentland Hills. Woodland enclosure exists to the south and west, however, the site lacks features readily able to provide an alternative green belt boundary to the north and would require additional woodland planting.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 21. Land at Goodtrees**

##### Hallam Land (0615)

The Goodtrees site is within the green belt and Pentlands Special Landscape Area.

The site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p130. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 4, within the Goodtrees Farm area. The Housing Study found this area not to be within walking distance of local convenience services or employment clusters. It was found to have poor access to the wider cycle network and public transport and this was unlikely to be improved. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. The area was also considered to have no scope for development due to its importance for the setting of Balerno and the adverse effect on the views toward the Pentland Hills and position to the west of the robust settlement boundary formed by mature woodland along Cockburn Crescent. As a result, the Housing Study concluded that the area was not suitable for development.

Development on this site would be distant from the core of Balerno and aside from mature woodland to its south, the site lacks features to its west readily able to provide an alternative green belt boundary.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 22. South of Cockburn Crescent**

Barratt David Wilson Homes (0677)

The South of Cockburn Crescent site is within the Green Belt and Pentlands Special Landscape Area.

The South of Cockburn Crescent site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology, the results are on p138. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 4, within the Marchbank House area. The Housing Study found this area was not within walking distance of employment clusters and unlikely to be improved. It also has poor access to the wider cycle network and public transport services and this was unlikely to be improved. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around.

Limited scope for development was identified in the northern part of the Marchbank House area, relating to the two fields within the representation site and associated with existing unscreened housing at Cockburn Crescent. Existing shelterbelts and field boundary trees give the opportunity to form new robust settlement boundaries. The Study concluded that the area was not suitable for development due to its poor accessibility.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

**Site 23. Highfield**

Taylor Wimpey (0200)

The Highfield site is within the Green Belt and the Drum Special Landscape Area.

The site is within sector 2 of the Housing study and forms part of the South East area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

**Site 24. Frogston Road East**

BDW and Catchelraw Trust (0209), Bo Adams (0363)

The Frogston Road East site is within the Green Belt, and part of the site is within an area of importance for flood management.

The Frogston Road East site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p51. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 2, within the South of Frogston Road East area. The Housing

Study found this area was not within walking distance to local convenience services or employment clusters and was this unlikely to be improved. The study also found this area did not have access to the wider cycle network and this was unlikely to be improved. The Study considered that there was no scope for development on this area due to its strong contribution to the setting of the city, visually prominent location and being beyond the firm settlement boundary formed by Frogston Road East.

The site forms a smaller part of the assessment area but its open rolling farmland contributes to the city's landscape setting and is highly visible from the By-pass, Frogston Road and Pentland Hills.

The proposal would breach firm green belt boundaries to the north and east. The site's west edge is open, lacks features readily able to provide an alternative green belt boundary and high voltage powerlines present a physical constraint. The Study concluded that the area was not suitable for development due to its present use, landscape character and contribution to the green network.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 25. Alnwickhill Road**

##### MacTaggart and Mickel Homes (0312)

The Alnwickhill Road site is in the Green Belt and a Special Landscape Area.

The Alnwickhill Road site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p49. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 2, within the South of Liberton Drive area. The Housing Study found this area did not have good access to the wider cycle network and this was unlikely to be improved. The study found the area had no scope for development due to its visual prominence and importance for the setting of the Braid Hills and the city and was of value to the strategic green network.

The site forms a small part of the assessment area, to its southeast, however, development in this location would impact upon the rural character of the Braid Hills and would be visually prominent in views from Holyrood Park and other elevated vantage points.

Whilst maturing woodland lies to north of the site, new structural planting would be required to the west, which lacks features readily able to provide an alternative green belt boundary to contain views from the Braid Hills.

The existing green belt boundaries and their open nature permit visual appreciation of the city's landscape setting. In combination with Site 44, allocation of the site would weaken the integrity of the green belt in this location.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

## Site 26. Calderwood

### Stirling Developments Ltd. (0303)

The Calderwood site is within the countryside policy area.

The site is within sector 5 of the Housing study and comprises the Overshiel, Bonnington and Linwater areas and was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

## Site 27. North of West Craigs

### West Craigs Ltd. & Dunedin Canmore (0352)

The North of West Craigs site is within the green belt and part of the site is within a Historic Garden/Design Landscape and Special Landscape Area.

The site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p23. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 1, within the Cammo Southern Parkland area. The Housing Study found this area is not within walking distance to local convenience services and that this is unlikely to be provided for, and the site has poor access to the wider cycle network, which is unlikely to be improved so would not support active travel overall. It also has poor access to public transport, this is unlikely to be improved and therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. Finally, the study considered there is no scope for development as the area is prominent in views from Cammo, Barnton and from the A8 and A902 and is an important undeveloped backdrop to the allocated developments at Maybury and Cammo.

Due to the site's knolly landform, development in this location would require visually intrusive ground modification. It would also affect the setting of the Cammo Inventory Site, including the outlying features of the category B Listed stone dyke at the top of Mausley Hill, roundel of trees and Cammo Water Tower.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

## Site 28. Cammo Fields

### Dunedin Canmore HA (0766)

The Cammo Fields site is within the green belt.

The site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p23. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 1, within the Cammo Southern Parkland area. The Housing Study found this area is not within walking distance to local convenience services and that this is unlikely to be provided for, and the site has poor access to the wider cycle network, which is unlikely to be improved so would not support active travel overall. It also has poor access to public transport, which is unlikely to be improved and therefore is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. Finally, the study considered there is no scope for development as the area is prominent in views from Cammo, Banrton and from the A8 and A902 and is an important undeveloped backdrop to the allocated developments at Maybury and Cammo.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 29. Land at Burdiehouse**

#### Hallam Land (0457)

The land at Burdiehouse is within the green belt.

The site is within sector 2 of the Housing study and form part of the South East area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate provision of housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 30. Land at Burdiehouse Rd**

#### Azad Murdochy (0361)

The land at Burdiehouse Road is within a Local Nature Conservation Site and a Local Biodiversity Site (Burdiehouse Burn Valley).

The site was not included the greenfield assessment. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan.

This small site lies to the north of new housing at Burdiehouse on the east side of Burdiehouse Road and to the south of the Burdiehouse Burn valley and its associated area of importance for flood control. It is bounded by stone field boundary walls and includes tall ruderal and scrub vegetation. To its north a local view has been retained from Burdiehouse Road to the category B Listed Limekilns.

Whilst the site includes a frontage to Burdiehouse Road, very limited scope exists for a form of development that would both address a key approach to the city, integrate with

built form to the south and open space to the east, and respect views to the Limekilns to the north.

This site is within a Local Nature Conservation Site and adjacent to Burdiehouse Burn Valley Park Local Nature Reserve. The site forms an important component on the edge of the wider site. It contains features of biodiversity value including trees and habitat mosaic and should be retained as part of the larger LNCS and LNR large open space and greenbelt zone with biodiversity value.

Due to its low-lying nature and proximity to existing SUDs and Burdiehouse Burn, it was identified as part of a local open space proposal contributing to the Green Network as part of LDP housing site allocation HSG 22.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 31. Hatton Village (Hatton Mains)**

#### Inverdunning (Hatton Mains) Ltd (0427)

The land at Hatton Village is within the green belt.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p214. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the Easter Hatton Mains area. The Housing Study found the area is not within walking distance of local convenience services or employment clusters and this is not likely to be improved. In addition, the area has poor accessibility to public transport which is unlikely to be improved. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. Finally, the Study found there was no scope for development due to the strong rural character and open landscape of this area which would be significantly affected by development which would be visible from the surrounding area including Ratho, Dalmahoy Road, the Ratho Hills and A71. The western part of the site forms part of the highly visible Ratho Hills ridge.

The site is promoted as a new settlement remote from Ratho and whilst existing woodland provides containment to the east, the site lacks features other than field boundaries to form an alternative green belt boundary.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 32. New Liston Road, Kirkliston**

#### Robertson Residential Group (0537)

The land at New Liston Road Kirkliston is within the countryside policy area and part of the site is within an area of importance for flood management.

The site was not included the greenfield assessment. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan.

The site lies north of the B800, east of the M9 which runs on a raised embankment and to the south of housing and open space at Kirkliston. The existing settlement to the north is edged by woodland and the Niddry Burn, a tributary of the River Almond. A more minor watercourse also runs east-west across the site. The site comprises gently rolling farmland, crossed by electricity poles and bounded by post and wire fence to the south. A scout hut lies to its north close to the Niddry Burn. The southern edge of the site subject to an Area of Importance for Flood Control and its western edge is influenced by traffic, an overhead gantry and noise from the nearby motorway. To its south within the Kirkliston Conservation Area, lie detached properties, including the Breastmill, Breastmill House and Maitland Bridge, which crosses the River Almond to the south. The site is not visually prominent in the wider landscape due to the screening effect of the existing settlement and M9 embankment, however, the site features in local views on the approach to Kirkliston from the west on the B800 and in glimpsed elevated views from the M9 with some screening by trees to the south. The B800 is part of the River Almond Core Path Route.

Whilst the site is not visually prominent from the wider area, it provides an open, rural setting to Kirkliston and its Conservation Area to the southwest. Any development would breach the robust settlement boundary formed by the wooded course of the Niddry Burn. Flood constraints could limit integration with the existing built up area.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 33. Norton Park**

#### Taylor Wimpey and Hallam Land (0603)

The Norton Park site is within the green belt and safeguarded for the potential relocation of the Royal Highland Centre.

The site is within sector 1 of the Housing study and forms part of the West Edinburgh area which was identified in the study. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Strategic enhancement of Edinburgh Airport, which includes safeguarding this site for the possible relocation of the showground, is a national development identified in NPF3. While draft NPF4 does not continue the national development designation, until the approval of NPF4 it is considered appropriate that the site is safeguarded for the possible relocation of the Royal Highland Centre.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 34. Lennie Cottages**

#### Roseberry Estate (0618)



The Lennie Cottages site is within the green belt.

The site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p21. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 1, within the Turnhouse Golf Course area. The Housing Study found the area is not within walking distance to local convenience services and this is unlikely to be improved. The area does not have access to the wider cycle network and this is unlikely to be improved. In addition, the area has poor accessibility to public transport which is unlikely to be improved. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. Finally, the Study found the area has no scope for development due to its prominence in views across the River Almond valley and from the A8 and its provision of an important undeveloped backdrop to the allocated developments at Maybury and Cammo.

The Council acknowledges that the site forms a small part of the overall greenfield assessment area and scale of development proposed is unlikely to affect wider views or the integrity of the Green Belt boundary along Craigs Road and Lennie Hill.

Nevertheless, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 35. Lang Loan**

Miller Homes Ltd (0649)

The Land Loan site is within the green belt.

The site is within sector 2 of the Housing study and form part of the South East area which was identified as a preferred site in the study. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

With regard to the Environmental Report (CD010) the Council is required to carry out a strategic environmental assessment of the Proposed Plan in accord with the requirements of the Environmental Assessment (Scotland) Act 2005 (CD146). The purpose of the assessment is to identify the significant environmental effects of the Plan and to identify mitigation to seek to offset any impacts that cannot be avoided. As a result, it comprises an assessment of the content of the Plan as published. As the Council took a decision not to include additional new greenfield sites for housing led development within the Plan, such as Lang Loan, there is no requirement to assess them or re-evaluate the assessments set out in the draft Environmental Report.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 36. Land south of Murrayfield Hospital**

Spire Healthcare Ltd (0719)

The site is within the green belt, a special landscape area and an area of open space.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p327. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 7, within the Murrayfield Hospital area. The Housing Study found the area is not within walking distance of employment clusters and this is unlikely to improve. In addition, the study found that the attractive parkland character, mature woodland which coalesces in more distant views and the steeply sloping topography of the site restricts development. It also considered the site to be of value for the strategic green network due to lying within an area identified as a green network opportunity and the site is largely designated as public open space associated with the hospital.

The site relates to the south and west of the assessment area, where development would impact on the parkland setting of and outward views from the category A Listed Beechwood House. Development in this location and the site access road proposed to its south are likely to impact on tree boundaries which maintain the wooded character of and views to Corstorphine Hill. The study concluded the site was not suitable for development.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 37. Land east of Winton Gardens**

#### Esk Property LLP (0726)

Land east of Winton Gardens is in the green belt, a designated conservation area (Norton Mains) and a special landscape area.

The site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p97. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 3, within the Morton Mains area. The Housing Study found the area is not within walking distance of local convenience services or employment clusters and this is unlikely to improve. The area also does not have access to the wider cycle network and is not likely to support active travel overall. In addition, the Study considered the area had no scope for development due to its visually prominent location which forms a robust edge to urban development and the area may be considered of value for the strategic green network due to lying within an area identified as a green network opportunity. The study concluded the site was not suitable for development.

The site forms a smaller part of the assessment area but conforms to its characteristics and qualities. The site lacks robust alternative green belt boundary and would require substantial planting. Overhead lines may pose a constraint to the southeast.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 38. Land at Baberton Road**

#### Stoddart Family (0749)

The land at Baberton Road is within the green belt.

The site is within sector 5 of the Housing Study and forms part of the East of Riccarton area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 39. Edge of Edmonstone Estate**

#### Scottish Enterprise (0760)

The site is within the green belt, a special landscape area, a local nature conservation site and a local biodiversity site.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p59. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 2, within the South East Wedge Parkland area. The Housing Study found the area was within walking distance of local convenience services and employment clusters and had partial access to the wider cycle network. Although the site was considered not to support travel by public transport, it was considered to partially support travel in terms of an identified major intervention (tram safeguard TR8 and South Orbital Bus route PT9). In addition, the area as a whole was considered not to have scope for development due to the importance for the setting of the urban area and strong visual links with other hills and greenspaces, including the Braid Hills, Holyrood Park and Craigmillar Castle Park. As a result, the Study concluded the area was not suitable for development.

Due to the sloping topography, any development of the site would be highly intrusive. The Edmonstone ridge is one of the semi-natural hill landscapes that punctuate the urban area and form the southern backdrop to the city and would be adversely affected by development in this location. The area is also considered of value for the strategic green network.

This site is within a Local Nature Conservation Site (LNCS) and forms an important component on the edge of the wider site. It contains features of biodiversity value including trees, woodland edge and habitat mosaic. It is adjacent to areas within the LNCS which are on the Ancient Woodland Inventory and should be retained as part of the larger LNCS open space and greenbelt zone with biodiversity value.

The Council recognises there has been considerable change in this area. In addition, it recognises that the Housing Study results look at the South East Wedge Parkway area as a whole, rather than just the edge of Edmonstone Estate area. The Council acknowledges that the whole of the proposed site is within 10 minutes walk of a bus stop on a public transport corridor (Dalkeith Road), which scores well for public transport accessibility with frequent services.

Overall, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 40. Lanark Road West**

John Brady (0353)

The Lanark Road West site is within the green belt.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p142. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the Dalmahoy Hill and Ravelrig Hill area. The Housing Study found the area was not within walking distance of local convenience services or employment clusters nor was this likely to be improved. The area has access to the wider cycle network via a quarry road but access is impeded by the Water of Leith path which is poor and upgrading is considered unlikely without an impact on the ecology of the area. The area also has poor access to public transport and is unlikely to be improved. Finally, the area was considered to have no scope for development due to the prominence of these hills and the physical constraints associated with developing steep slopes.

The site forms a small part of the wider South of Dalmahoy assessment area, adjacent the South of Ravelrig area.

Despite more recent tree removals, only very limited scope for small scale development, set back from the road exists due to the site's elevated and visually prominent corner location on the settlement edge. Dense development would be contrary to the settlement pattern along the valley of the Water of Leith and impact on its rural character.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 41, Land south of Gilmerton Station Road**

MacTaggart and Mickel Homes (312)

The land south of Gilmerton Station Road is within the green belt.

The site is within sector 2 of the Housing Study and form part of the South East area which was identified as a preferred site in the study. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 42. East Foxhall**

Landowner of East Foxhall (0544)

The site at East Foxhall is within the green belt, part of the site is within the safeguard for a potential additional runway at Edinburgh airport and the edge of the site is in an area of importance for flood management.

The site is within sector 6 of the Housing Study and comprises the Kirkliston area which was identified as preferred site in the study should greenfield housing sites be needed. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan. Therefore, the Council took a decision not to allocate this site in the Plan.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 43. Riccarton Village**

#### Miller Homes (0256)

The Riccarton Village site is within the green belt. There is also an area of importance for flood management within the site.

The site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p165. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 5, within the South of Riccarton area. The Housing Study found the area was not within walking distance of local convenience services and this is unlikely to be provided for. The site has access to the wider cycle network but is impeded by the Water of Leith path, upgrading would be difficult without a significant impact on the ecology of the area. The area also does not have good accessibility to public transport. Therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. The Study concluded the site was not suitable for development due to its poor transport accessibility. The site was considered to have some scope for development being visually contained with woodland and landform providing a basis for new settlement boundaries. No scope for development was found in that part of the site to the north of Long Dalmahoy Road, which would impact upon the more rural valley landscape. Overhead powerlines to the south and flood risk in the southeast pose constraints to development but is considered of value for the strategic green network.

With regard to the Environmental Report the Council is required to carry out a strategic environmental assessment of the Plan in accord with the requirements of the Environmental Assessment (Scotland) Act 2005 (CD146). The purpose of the assessment is to identify the significant environmental effects of the Plan and to identify mitigation to seek to offset any impacts that cannot be avoided. As a result, it comprises an assessment of the content of the Plan as published. As the Council took a decision at the Main Issues Report stage to only include its preferred new greenfield sites for housing led development within the Choices for City Plan 2030, such as East of Riccarton, there was no requirement to include an assessment of other greenfield sites in the draft Environmental Report (CD024).

The Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 44. Alnwickhill Road**

##### Juniper Residential Ltd (0786)

The site at Alnwickhill Road is within the green belt, and a special landscape area.

The Alnwickhill Road site was not identified as a preferred location in the Council's Housing Study as it did not score well under the assessment methodology; the results are on p49. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 2, within the South of Liberton Drive area. The Housing Study found this area did not have access to the wider cycle network and this was unlikely to be improved. The Study found the area had no scope for development due to its visual prominence and importance for the setting of the Braid Hills and the city and was of value to the strategic green network.

The site forms a small part of the assessment area, to its northeast, however, development in this location would impact upon the rural character of the Braid Hills and would be visually prominent in views from Holyrood Park and other elevated vantage points.

The existing green belt boundaries and their open nature permit visual appreciation of the city's landscape setting from the urban edge. In combination with Site 25, allocation of the site would weaken the integrity of the green belt in this location.

This site forms an important part of a wider green network. It contains features of biodiversity value, particularly the boundary wooded strip and trees, and habitat mosaic on the urban edge, and should be retained as part of a larger open space and greenbelt zone with biodiversity value.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 45. Land East of Mounthooley Loan**

##### Catchilraw Trust (0137)

The site is within the green belt, a special landscape area, a local nature conservation site and a local biodiversity site.

The Alnwickhill Road site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p99. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 3, within the Mortonhall area. The Housing Study found this area was not within walking distance of local convenience services and this was unlikely to improve. The area does not have access to the wider cycle network and this is unlikely to improve and would not support active travel overall. The site also does not support travel by public transport and therefore, it is likely to encourage car based trips contrary to the outcome of the Plan that you don't need to own a car to move around. Finally, the study concluded the area had no scope for development due to its designation as a special landscape area and its value to the strategic green network.

The site relates to the assessment area's west edge adjacent Mounthooley Loan and Frogston Road. Development in this location would impact adversely on the character of sloping, wooded farmland comprising the policies of Mortonhall House, which provide a robust edge to the urban area and are prominent in views from the Pentland Hills.

The site contributes to the unbroken landscape scale green network stretching from Midlothian to Blackford Hill.

This site is within the Braid Hills and Mortonhall Local Nature Conservation Site and forms an important component of the wider site. It is part of a complex habitat mosaic containing features of biodiversity value e.g. trees and a mosaic of woodland edge and other habitat. It is bounded to the north and west by areas on the Ancient Woodland Inventory and should be retained as part of the larger LNCS open space and greenbelt zone with biodiversity value.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 46: West of Burdiehouse Road**

Gordon Henderson (0164)

The site is within the green belt.

The site was not included the greenfield assessment. However, for the reasons set out in the Council's housing position statement above it considers there is an adequate housing land supply and allocated sites are considered deliverable in the period of the plan.

The site comprises a strip of maturing woodland to the southeast of Burdiehouse Square, situated between Old Burdiehouse Road and the dual carriageway at Burdiehouse Road (A701).

It is visually prominent on the approach to and from the city on the A701. The tree cover contributes to the local townscape and screens a large electricity distribution site to the west. Overhead power lines cross the site to the south.

The site has no scope for development. Whilst roadside development exists to the north, any development would require extensive tree removal would impact on the setting of the city from a key arterial route. The site narrows and becomes more constrained to the south, where overhead lines would also limit development.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 47: Gogar Mount**

NatWest 0477

The site is within the green belt, a special landscape area, and part of the site is within an area of importance for flood management.

The Gogar Mount site was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology, the results are on p49. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 1, mostly within the SASA area. The Housing Study found the area was not within walking distance of local convenience services and this was unlikely to improve. The area does not have access to the wider cycle network and this is unlikely to improve. The area does not support travel by public transport but does have limited support for travel based on an identified transport intervention (Tram safeguard to Newbridge TR10 and orbital bus route West Edinburgh A8 corridor PT4). Finally, in terms of landscape the study considered the site had no scope for development due to significant adverse effect on the largely rural character of the area, and the statutory work undertaken by SASA, despite the limited visibility of the area and potential for robust new settlement boundaries.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

#### **Site 48: Peffermill**

##### University of Edinburgh (0464)

The site is within the green belt, and area of open space, and part of the site is within a special landscape area.

The Peffermill site was not identified as a preferred location in the Council's Housing Study as it did not score particularly well under the assessment methodology, the results are on p87. The site is in greenfield sector 2, within Peffermill Playing fields area. The Housing Study found the area had access to local convenience services and employment clusters. It also had partial access to public transport although it had scope for improvement. However, the study found the site had no scope for development due to the number of landscape constraints on the site as well as the risk of flooding. In addition, the study considered the site was of value to the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself.

The Council acknowledges that the site is currently used for recreation as playing fields by the University and that some intensification of use, including development, could be supported, particularly given its detached nature from the wider green network, subject to an appropriate design response to respect the landscape importance of the site. No modification proposed, however, should the Reporter be so minded the status of the site may be reconsidered for specific university uses.

#### **Site 49: Wisp**

##### Springfield Properties (0239)

The site is within the green belt, a Green Blue Network Proposal (BGN46 South East Wedge Parkland) and an active travel proposal (ATPR25) passes through the site.

The Wisp site was not identified as a preferred location in the Council's Housing study as it did not score particularly well under the assessment methodology and the results are on p59. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 12, within South East Wedge Parkland area. The Housing Study found



the area was within walking distance of local convenience services and employment clusters, and although it did not have access to the wider cycle network it could be improved. With regard to public transport it did not support travel by public transport but there was limited scope based on an identified major intervention.

The key reason why the site was not supported was because of the importance of the landscape for the setting of the urban area and strong visual links with other hills and green spaces. Due to topography any development would be highly visually intrusive. In addition, the area was considered of value for the strategic green network due to lying within an area identified as a green network opportunity in Edinburgh itself. The South East Wedge Parkland has recently been designated open space and contributes to the unbroken landscape scale multi-functional green network stretching from Midlothian to Holyrood Park.

As a result, the Council does not consider there is justification for the allocation of this site for housing development. **No modification proposed.**

### **Site 50: Lochend**

#### Aviagen (0365)

The site was not included the greenfield assessment.

The site is within the countryside policy area and within the airport public safety zone. The site comprises a relatively small triangular parcel of scrub vegetation and occasional trees, field boundary planting, and woodland to the west along the Core Path 10, Newbridge to Queensferry and Kirkliston. It sits between the M9 to the west, Aviagen premises to the south and single storey cottages on Lochend Road to east adjacent Edinburgh Airport. A sewage works and Hallyards Woods Local Biodiversity Site lie further to the north.

The site is not particularly visually prominent being situated on flat, relatively low-lying land bordering farmland in the lower Almond basin and the airport's open runways, with the flight path having a strong bearing on noise and visual impact. Planting on adjacent slip road also limits views from main road network. In landscape terms, some scope for development may exist, however, due to its location within an airport public safety zone the Council does not support identifying the site as being within the built up area and in turn encouraging the use of the site for development. **No modification proposed.**

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

Issue 10	Other Sites	
Development plan reference:	N/A	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p> Abrdn (0425)  AEW (0524)  Aisby Enterprises (0479)  Alex Inglis (0330)  Alistair Cant (0397)  Ally Williamson (0381)  Andrew Gray (0388)  Anne Wellman (0229)  Arnold Myers (0758)  BDW Trading (0350)  Ben Gillett (0324)  Caroline Ecans (0398)  Catherine Riddle (0236)  Christopher J Inchley (0102)  David Price (0224)  Derek Mitchell (0171)  Donald Macaulay (0188)  Donald R. MacLeod (0525)  Dr Christopher Masters (0061)  E&amp;A Partnerships Ltd &amp; Niddrie Development Company Ltd (0753)  Elizabeth Clapham (0038)  Fiona MacLeod (0505)  Fiona Riddoch (0070)  Gavin Sears (0405)  George W S Heatley (0009)  Goff Cantley (0032)  Gordon Mackenzie (0234)  Gordon Rintoul (0288)  Graeme Parry (0230)  Hillend Leisure Ltd (0080)  Ian Rankin (0235)  Ian Ross (0423)  Jan Hulme (0420)  Jane Dudman(0563)  Jay Chimo (0674)  John Gee (0325)  Judith McLean (0794) </p>	<p> Judith Webber (0104)  Kathryn Poolman (0574)  Lorraine Peterson (0226)  Luke Robertson (0114)  Malcolm MacLachlan (0322)  Margaret Meiklejohn (0040)  Michael Adrian Hall (261)  Michael Davies (0554)  Michael Poolman (0572)  Michael Struthers (0606)  Mrs Daphne Torrie (0449)  Mrs Katherine Claire Taylor (0010)  Neil Ross (0610)  New Town Dundas Street Residents (0795).  Nicholas Hepworth (0052)  Nigel Baillie (0093)  Norman Angus (0233)  Patricia Willder (0205)  Peter Fantes (0319)  Prof D N Bateman (0004)  Redline Planning Services Ltd (0673)  Richard Maguire (0119)  Robert Cochran (0227)  Roger Vander Steen (0175)  Rona Ferguson (0006)  Russel Gray (0444)  Russell Road Edinburgh Ltd (0739)  Sarah Muirhead (0329)  Scott Gibson (0652)  Sean Walker (0116)  Serena Smith (0201)  The Davidson's Mains and Silverknowes Association (0454)  The Friends of Midmar Paddock, Edinburgh (0121)  Watkin Jones Group / New Mart Road Limited (0593),  Watkin Jones Group (0516)  William Brotherston (0754) </p>	

<b>Provision of the development plan to which the issue relates:</b>	Other sites within the urban area.
<b>Planning authority's summary of the representation(s):</b>	
<p><b>Midmar Paddock</b></p> <p><u>The Friends of Midmar Paddock, Edinburgh (0121), Dr Christopher Masters (0061), Roger Vander Steen (0175), Andrew Gray (0388), Lorraine Peterson (0226), Ian Rankin (0235), Caroline Ecans (0398), Dr Christopher Masters (0061), Nicholas Hepworth (0052), Mrs Katherine Claire Taylor (0010), Norman Angus (0233), Jane Dudman(0563), Scott Gibson (0652), Judith Webber (0104), Malcolm MacLachlan (0322), Jay Chimo (0674), Peter Fantes (0319), Graeme Parry (0230), Richard Maguire (0119), Gordon Mackenzie (0234), Derek Mitchell (0171), Anne Wellman (0229), George W S Heatley (0009), Donald R. MacLeod (0525), David Price (0224), Catherine Riddle (0236), Alistair Cant (0397), Alex Inglis (0330), Jan Hulme (0420), Arnold Myers (0758), Robert Cochran (0227), Gordon Rintoul (0288), Michael Davies (0554), Luke Robertson (0114), Sarah Muirhead (0329), Serena Smith (0201), Russel Gray (0444), Michael Struthers (0606), Michael Adrian Hall (261), Malcolm McGechan (0202), Ally Williamson (0381), Donald Macaulay (0188), Sean Walker (0116), Ben Gillett (0324), Peter Fantes (0319), Ian Ross (0423), Kathryn Poolman (0574), Michael Poolman (0572), John Gee (0325), Christopher J Inchley (0102), Elizabeth Clapham (0038), Prof D N Bateman (0004), Mrs Daphne Torrie (0449), Rona Ferguson (0006)</u></p> <p>Midmar Paddock should be protected and maintained as open green space. Such areas are widely used by local residents and are invaluable for residents' well being. They are a vital constituent of the City of Edinburgh environment and should be protected.</p> <p><u>Margaret Meiklejohn (0040), William Brotherston (0754), Neil Ross (0610), Patricia Willder (0205)</u></p> <p>The plans on page 9 and 10 (Spatial strategy) should be amended to show Midmar Paddock as dedicated green space which is not to be built on.</p> <p><u>Fiona Riddoch (0070)</u></p> <p>Midmar Paddock is protected by various supportive designations including "green belt" and the Paddock should be added explicitly to the Spatial Strategy (illustrative) as part of the Blackford and Hermitage green belt. Its omission is clearly an error and explicit inclusion on the map will avoid future doubt.</p> <p><u>Goff Cantley (0032), Fiona MacLeod (0505)</u></p> <p>Midmar Paddock should be specifically protected.</p> <p><b>Braid Hills</b></p> <p><u>The Friends of Midmar Paddock, Edinburgh (0121), Ian Rankin (0235)</u></p> <p>No mention of Braid Hills as a place where development should not happen in Paragraph 1.7.</p>	

### **106-114 Dundas St (Centrum House).**

#### New Town Dundas Street Residents (0795)

A planning application for this site was refused by the Council. Any future planning application for this site should be required to reflect the Planning Committee's views, as set out in the DMSC meeting on 8 September 2021.

### **Highfield Gilmerton**

#### Nigel Baillie (0093)

The Spatial Strategy map shows that the greenbelt is maintained along Ferniehill Road where it meets The Old Dalkeith Road. The area known as Highfield Gilmerton should remain greenbelt land. It is adjacent to the Drum Woods which is a conservation area with protected species present. It should not be developed as neighbouring greenfield sites have been destroyed through overdevelopment. The South East Edinburgh Green belt has, lost 205 of 713 hectares from Burdiehouse to Brunstane to recent development. Allowing development on this Highfield area would go against policies 3 Nature Crisis and 32 Natural Places, Natural Planning Framework 4

### **Land between Cramond Road North and Cramond Road South**

#### Gavin Sears (0405)

I would like to support and ensure clarity that the spatial strategy is clear that the land between Cramond Road North and Cramond Road South previously designated for a sports development remains as greenbelt.

### **Torphin Road**

#### Judith McLean (0794)

Planning permission should not be granted for any kind of housing development on the car park. This car park is part of the Pentland Regional Park and there is support in the local community for it to be bought back by the Council / Regional Park under a compulsory purchase order. It could then be used for parking for easy access to the Pentland Hills.

Should be classed as Greenbelt and not brownfield land.

### **Russel Road**

#### Russell Road Edinburgh Ltd (0739)

The site is currently proposed as 'Urban Area' in the context of the Proposed Plan. In light of the opportunity presented to deliver a regeneration approach for the site, and surrounding context it is recommended that the Russell Road area is identified as a Place Policy with suitable guidance on the approach to delivering a residential led opportunity included within the finalised plan. The site presents an opportunity to bring forward

regeneration of the wider area through a combined and coordinated vision to maximise value and regeneration benefits to this area of the city. The subject site presents an opportunity for housing led mixed use development.

The site and its surrounds are currently characterised by a mix of industrial and trade uses. Circumstances are changing in relation to a number of these ownerships, which is positive in the context of a potential approach to bring forward a coordinated redevelopment of the wider site. It is noted that discussions are ongoing with landowners.

The site is in a prime position, being one of the last key brownfield opportunities in close proximity to the city centre, and with the changing nature of elements of the surrounding environment and land uses, presents an opportunity to look at the wider site. The current configuration and mix of uses on the site can be viewed as a missed opportunity in terms of the connectivity between Roseburn and Gorgie / Dalry, and the opportunity to introduce more active uses could significantly improve the quality of environment, connectivity and safety and security of pedestrian and cycle routes through the area.

The subject site lies in close proximity to the existing greenspaces of Murieston Crescent and Roseburn Park. The site is in a pivotal location with opportunity to better connect the neighbourhood centres of Roseburn and Gorgie. The aspirations for the site provide an opportunity to link into the proposed Roseburn / Fountainbridge green network linkage, with the Russell Road site sitting directly on a new cycle link planned to connect the nearby Roseburn and Union Canal Paths which will integrate it with the wider cycle network. The proposed site could easily and effectively link into existing active travel routes providing good connectivity into the rest of the City.

CEC want City Plan 2030 to direct development to where there is existing infrastructure capacity. The subject site and wider area are conveniently located within existing infrastructure, including education, healthcare and sustainable transport connections.

### **New Mart Road, Chesser**

Watkin Jones Group / New Mart Road Limited (0593), Watkin Jones Group (0516)

The site is currently considered as a 'Commercial Centre' in the adopted LDP, and in the proposed City Plan this has been amended to a local centre in Table 14. Submit that New Mart Road should be considered as a Place within the Proposed Plan, and appropriate guidance provided to maximise the opportunity of this location as a genuine mixed use opportunity in a key node of the city with excellent accessibility and connectivity.

WJG are progressing discussions with the Council on a residential led BTR and student accommodation development at New Mart Road, and a formal planning application is to be lodged in January / February 2022. The current approach being progressed by WJG in seeking a residential led regeneration of the New Mart site is directly as a result of the current operations at World of Football and World of Bowling no longer being viable as an ongoing business.

City Plan 2030 introduces an ambitious approach to housing policy in seeking to maximise the use of brownfield land rather than greenfield. The WJG support this aim, however caution that the approach needs to be deliverable, and to meet the expected housing requirements throughout the lifetime of the plan. It is recognised that many of the identified

brownfield housing land opportunities are currently in active alternative use and with no immediate prospect of conversion to housing. WJG wish to highlight that the site at New Mart can be considered to be a valuable future brownfield opportunity which can directly contribute to the evidence base in the City Plan.

## **Glenogle Road**

### Abrdn (0425)

The Glenogle Road site should be identified as a housing proposal. The site occupies a key urban location in the Inverleith area of Edinburgh. It is bounded to the north by the Water of Leith, to the east by Brandon Terrace comprising residential tenements with commercial uses at ground floor, to the west is predominantly residential areas including the Glenogle Park Colonies and to the south, the site is bounded by Glenogle Road itself.

The Glenogle site extends to approximately 0.65 hectares and is currently used by Abrdn as a data centre with limited ancillary office space and associated car parking. The facility is scheduled to become redundant and surplus to requirements in approximately 5 years.

Using the Council's assessment matrix from Choices the sites development potential has been assessed:

#### *Active Travel:*

Does the site support travel by foot to identified convenience services? **Yes**

The site is well located for access to grocery shopping, being within 5-10 minutes walk of both the Tesco and Lidl supermarkets supplemented by the availability of local convenience shops.

Does the site support travel by foot to identified employment clusters? **Yes** - The site is well located for access to identified employment clusters and is adjacent to a number of existing employment sites, including substantial office buildings at Tanfield, Brandon St and Henderson Row. While notably the site lies within 1,000 metres of George Street, at the heart of the city centre and the various employment opportunities this provides.

Does the site have access to the wider cycle network? **Yes:** - The site has convenient access to both the Quiet Routes and National Cycle networks.

#### *Public Transport*

Does the site support travel by public transport? **Yes:-** The site benefits from being located close to bus stops on Brandon Terrace, Inverleith Terrace and Canonmills which are served by a number of bus routes providing a frequent and convenient service. The Edinburgh Tram line and other city centre transport facilities including the Bus Station and Waverley railway station are also within walking and cycling distance.

#### *Community Infrastructure*

Does the site have sufficient primary school infrastructure to accommodate the development without further intervention? **Partially:-** The Council's Education appraisal which supports City Plan 2030 identifies that Stockbridge primary school has a capacity of 294 pupils and a baseline peak of 251 before development proposals. Pupils generated by developed in the LDP 2016 and City Plan 2030 are expected to increase primary school pupils to 300, based on projected school role projections. The education appraisal also

advises that the Council is considering a catchment change to Stockbridge primary school to address development proposals in the area. However, the Background Monitoring Statement which supported Choices for City Plan 2030 and shows the projected capacities at Edinburgh's schools in 2032 shows that Stockbridge Primary has a projected capacity at 2032 of up to 100 and St Mary's Roman Catholic Primary School has a projected capacity of 101-200 spaces. On the basis of the above, a further review of school provision is required, but it is considered that any primary school capacity issues could be mitigated through appropriate intervention, including contributions from residential development to enable the release of the site for development.

Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention? **Partially:-** The site falls within the Broughton High School Catchment which is currently operating at above capacity. However the Council's education appraisals identifies that additional pupils from new housing development could make a contribution towards increasing its capacity.

#### *Flood Risk*

Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management? **Yes:** - Council's strategic flood risk assessment identified the site as one which may be subject to flood risk from fluvial and surface water and that a flood risk assessment would be required to support development in this area. Ramboll has prepared a floodrisk assessment of the site. The findings of the floodrisk assessment concludes that the site is located in an area of low flood risk from all sources:

- Fluvial/Tidal – the site is in an area of Low likelihood of fluvial flooding. Adjacent to the site is the Water of Leith whereby a High risk of flooding is associated. However, this is not shown to have an effect within the site boundary.
- Surface Water – a risk of surface water ponding is shown on the southern site boundary, this occurs in an area of low topography and mitigation measures including the development of a new drainage strategy for the proposed development are in place to mitigate any impacts from surface water or sewer flooding.
- Sewer Flooding – similar to surface water, there is a risk that sewer surcharge and flooding could lead to overland flow on the southern site boundary, although no information regarding the capacity of the existing public system was available.
- Groundwater – considered to be a Low based on a review of groundwater levels and site topography.
- Reservoirs, Canal and Other Artificial Sources – considered to be Low based on no potential sources being located within vicinity of the. The SEPA flood map also identifies that the site is at low risk of fluvial flooding.

#### **Tesco – Davidsons Mains**

Redline Planning Services Ltd (Tesco) (0673)

Tesco request that their store and car park at Davidson Mains (shown in document RLP02) is identified as a development opportunity in the LDP. This should include the specific allocation of the site for housing on the LDP proposals map, and the inclusion of

the site within table 2 of Part 4 of the Proposed LDP as capable of accommodating c.100 units.

The Tesco store and car park is located within the Davidson Mains Local Centre Planning permission ref. 20/01410/PPP was resolved to be granted for the development of 36 flats in October 2020 on land including part of the Tesco car park site to the rear of the store. In resolving to approve planning permission, Members of the City of Edinburgh Council Planning Committee found that these proposals “would not undermine the function of the centre” and that the “the proposed residential use would create homes immediately adjacent to the local centre, which could mutually benefit both residents of the development and Local Centre itself through additional footfall and vitality.” Tesco maintain their ambitions to undertake a high density, residential led mixed use development on their land at Davidson Mains. This will build on the principles established as part of the consideration of application ref. 20/01410/PPP and will involve a flatted development above a continued retail offer.

### **Tesco – Broughton Road**

#### Redline Planning Services Ltd (Tesco) (0673)

Tesco request that the opportunity to deliver a high-density residential development above their existing Broughton Road store and car park is incorporated into the Proposed LDP. This should include the specific allocation of the site for housing on the LDP proposals map, and the inclusion of the site within table 2 of Part 4 of the Proposed LDP.

Tesco are also in discussions with operators about the potential for a flatted/PRS/student housing development above their store at Broughton Road (i.e. a vertical extension occupying the air rights over the store) and have engaged in discussions with officers at the City of Edinburgh Council about the potential use, form, scale and design of this development. Tesco firmly believe that this intensification of uses on their Broughton Road site will underpin the Proposed LDP key policy driver a sustainable and net zero city. This form of development represents the efficient use of land, will help maintain viability of services within the local centre, encourages effective provision of public transport and help to deliver “A city in which everyone lives in a house which they can afford” (as set out on pages 26-29 of the Proposed LDP).

### **Tesco – Corstorphine**

#### Redline Planning Services Ltd (Tesco) (0673)

Tesco request that their committed residential development on land at their Corstorphine store (show in document RLP01) is reflected as an allocation on the LDP proposals map and within table 2 of Part 4 of the Proposed LDP as a site capable of accommodating 24 units.

### **Tesco - South Gyle**

#### Redline Planning Services Ltd (Tesco) (0673)



Tesco request identifying the Tesco landholding at South Gyle as a specific housing led mixed redevelopment opportunity within EP4 of Place 19 Edinburgh Park/South Gyle.

Tesco Personal Finance PLC has a 4.3 ha landholding at 2 South Gyle Crescent, Edinburgh. This is occupied by the headquarters of Tesco Personal Finance, associated parking and vacant land. The existing office and 215 car park was approved in May 2006 (ref. 05/02513/FUL).

Permission was later approved for additional phases of office development on land around the Tesco Bank site. These were not however built out, and have since lapsed. Tesco can confirm that they no longer have any intention of developing offices on this land, and that the parcels are surplus to their requirements.

The housebuilder has advanced their development proposals for the site, and has undertaken pre-application consultation for the development of 300 new homes including affordable housing, retail, commercial space and a nursery. A component part of these proposals is the relocation of the existing car park adjacent to the Tesco bank premises, so that it does not bisect the residential development site. A site plan and copy of the indicative development layout has been supplied.

The CP 2030 identifies that the site forms part of the Edinburgh Park/South Gyle area of West Edinburgh. The Proposed LDP sets out that the Council's vision is to change the character of this area over time from a business dominated environment with limited evening activity to a thriving mixed use and well integrated part of the city (paragraph 3.64).

Place based policy 19 sets out specific land use planning considerations relevant to Edinburgh Park/South Gyle. This policy establishes that planning permission will be granted for development which maintains the strategic employment role of the area, and introduces a wider mix of uses. Various key requirements are set out to achieve this, including part c) which states that housing will be acceptable in principle "as a component of business-led mixed-use proposals". This requirement sits at odds with the vision to introduce a mix of uses to the area, and in particular in those locations which are already characterised by office development. In such locations, we do not consider that other uses (including housing) should have to be a component of business proposals, but instead that they should be able to stand on their own.

Therefore, request that this specific requirement is amended, to allow some flexibility in the policy wording to allow residential-led mixed-use proposals to come forward in these situations.

The Proposed LDP also sets out a series of development opportunities (EP1-EP5) shown on map 26. The landholding is located in area EP4 on map 26 of the Proposed LDP, and is identified as a 'Business led redevelopment' opportunity. Tesco object to this generic land allocation, and instead request that their surplus landholding at South Gyle is identified as a specific 'housing-led mixed redevelopment' opportunity within parcel EP4 (which should also be separately identified in the associated key, distinct from EP3). This allocation will more closely reflect the Council's vision to introduce a mix of uses in a location which is already characterised by office development, while also meeting Tesco's ambitions to dispose of the site to accommodate a residential-led mixed use development in an area. This form of development will also comply with overarching development requirements.

The development principles for the areas EP3-5 are summarised on page 79 of the Proposed LDP. Separate consideration should be given to areas EP3 and EP4. Specific allowance should also be made for the inclusion of residential-mixed use development proposals to come forward within are EP4, and we therefore request that this criterion is reworded.

This residential development opportunity should be is reflected in Table 2 of Part 4 of the Proposed LDP. Tesco are aware that separate representations have been made by others highlighting that there is a significant shortfall of allocated housing land to meet requirements. The identification of Tesco's land at South Gyle for housing development will therefore provide CEC with the necessary flexibility to allow housing-led development in this suitable and sustainable brownfield location.

#### BDW Trading (0350)

Object to Policy Place 19 Edinburgh Park/South Gyle and to the non-allocation of surplus land adjacent to Tesco Bank for housing-led development.

We acknowledge and support City Plan's approach to encouraging mixed-use and housing development in the South Gyle area, but we consider that a more tailored approach is required in respect to BDW Trading's interest in Tesco Bank's surplus land.

BDW Trading has submitted a Proposal of Application Notice and undertaken pre-application consultation for housing-led use on the land in question.

It should be noted that the consultation did not result in any objections to the principle of redeveloping for housing although, as one would expect, some questions and concerns were raised regarding possible traffic impacts and the scale of the development.

BDW Trading have had a number of pre-application meetings with the Council to discuss the content of a detailed planning application, based on the layout presented at the public consultation. There is general support for a residential-led development, accommodating some business and commercial uses as proposed at consultation. There is also support for the relocation of the Tesco Bank carpark, the current location of which is not conducive to a coherent development of the surplus land.

BDW are now refining and developing the detail of the proposals prior to submission of the planning application early in 2022.

If that application is granted prior to City Plan's Examination, we anticipate that this representation can be withdrawn.

Support the City Plan Spatial Strategy Map 2, which refers to 'Housing in a Strategic Business Centre'. However, do not consider the precise wording of Policy Place 19 on page 77 adequately reflects or supports the specific proposal which BDW and Tesco Bank are bringing forward.

This amendment will not undermine the policy intent to retain the strategic business function of the South Gyle area, but allows appropriate flexibility to deal with individual applications that in themselves do not comprise predominantly business uses.

Moreover, we note that Proposed City Plan Map 26 refers to “business-led redevelopment” in areas EP3 & EP4. The subject site is in area EP4. We therefore recommend that EP4 is distinguished from EP3 through modification.

It should also be noted that BDW Trading has made a separate representation to Proposed City Plan, explaining that there is a very significant shortfall of allocated housing land to meet requirements.

In our view the proposals for the Tesco Bank surplus land are sufficiently advanced and supported to merit specific allocation in City Plan as a Housing Proposal in Table 2. Part 4. Approximately 300 homes can be accommodated on the site and a specific Housing Proposal can then be identified in the Plan’s housing supply and count numerically to the reduction in the shortfall in allocated housing sites that we have identified.

We recommend that the boundary of this additional housing proposal reflects that shown in the consultation presentation boards, but excluding the existing Tesco bank and relocated car park, as this area will remain in business uses.

## **Lothianburn**

### Hillend Leisure Ltd (0080)

Hillend Leisure Ltd object to the non-inclusion of their site at Lothianburn regarding the proposed Pentland Trail Centre. It is requested that the site is identified on the proposals map with an appropriate allocation boundary or designation regarding the proposals for a new recreational outdoor leisure activity centre and associated uses. This could be similar to that of the adjacent Midlothian Sports Centre at Hillend, which has a specific allocation of VIS3 Midlothian Snowsports Centre within the Midlothian Local Development Plan.

## **Land at the Wisp**

### E&A Partnerships Ltd and Niddrie Development Company Ltd (0753)

The site (Land at The Wisp) should be included within Table 2 as a residential development allocation.

The site is being promoted as a sustainable residential development on a brownfield site within Edinburgh’s urban area. The allocation of this site for residential development would accord with the principles of sustainable development as set out in Scottish Planning Policy, whilst assisting City of Edinburgh Council in meeting the principles as set out in the Proposed City Plan 2030.

The site is capable of accommodating a significant residential development which will restore this vacant brownfield site to active use, remove an eye-sore site which poses a potential safety risk to members of the public, assist the Council in meeting their housing land requirements in the City, and facilitate transportation improvements which will benefit the wider area.

A Development Framework Report ('DFR') for the site has been prepared which sets out broad development parameters:

- Depending on the final mix of housing types, layout and tenures, the site could accommodate between 175 and 400 residential units.
- Creation of a new vehicular route through the site, following the alignment of proposed Road Improvement Proposal R2 - West of Fort Kinnaird Road to The Wisp.
- Safeguarding an active travel route through the site, following the alignment of proposed active travel safeguard ATSG25 – Wisp / Fort Kinnaird Link.
- Areas of open space, creation of SUDS pond and tree planting.
- Pedestrian paths located throughout the site and linking with surrounding areas, to encourage a porous development and pedestrian permeability.
- Facilitating the development of a brownfield site within a highly sustainable location in the urban area, embracing the principles of a 20-minute neighbourhood, and bringing a long-term vacant site back into beneficial use.

ECS Transport have prepared an Accessibility Assessment which demonstrates the excellent accessibility of the site by all modes of transport including pedestrians, cyclists, public transport users, and private car users. The Accessibility Assessment models a 20-minute walking isochrone from the site, which demonstrates the sustainability of the site and how it conforms with 20-minute neighbourhood principles. Specifically – retail, commercial, education, leisure and public transport opportunities are all located within a 20-minute walk of the site.

An initial assessment of ground conditions on site has been undertaken including 22 intrusive trial pits. These investigations identify the requirement for land remediation before the site can be redeveloped for residential uses. Invasive species are present on site which will require to be managed through an appropriate programme of works. An indicative Engineering Strategy for the site has been prepared which explains how the environmental constraints could be mitigated as part of any redevelopment.

We have also assessed the site's suitability for development using the 'effectiveness' methodology of Planning Advice Note 2/2010, as well as the Council's own 'Urban Area Site Assessment' methodology. Both assessment indicate the site is an excellent candidate for residential development and should therefore be included as an allocation in City Plan 2030.

### **Three Bridges Business Park**

#### Aisby Enterprises (0479)

Requested that the proposed Three Bridges Business Park is identified as an Area of Economic Importance on the North West Proposals Map and included as a new Place – Based Policy.

Representations were submitted in respect of the site to the Choices for City Plan 2030 Main Issues Report Consultation in April 2020 (MIR Site Ref:50). At that point the proposals were for a mixed use residential-led development. Since then Savills has been appointed to review the opportunity from a commercial perspective and have reworked the

original concept to provide a more readily implementable employment development. An Indicative Development Proposal (IDP) has been prepared. These proposals seek to promote the 'Three Bridges' site as a key strategic employment site that can create well in excess of 750 jobs as part of the Council's new City Plan 2030. Given that the site offers an excellent opportunity to provide new distribution, commercial and industrial development which can bring new employment opportunities to the surrounding area there has been significant interest from developers in taking forward these proposals, subject to securing an allocation in the forthcoming LDP. Given the highly visible nature of the eastern part of Site B, the proposed uses would be as follows:

- Drive-thru (food and coffee)
- Petrol Filling Station to include electric vehicle charging
- Hotel
- Small terrace of retail units
- Car showrooms

Given the proximity to Edinburgh, combined with such good motorway access, the western area of Site B would be attractive for industrial and distribution uses (approximately 400,000 sq ft). Research reviewing the rising demand for warehouse distribution spaces shows that demand for this type of floor space is only likely to rise as the number of households living in the region grows. The British Property Federation's What Warehousing Where? report (2019) states that every new home requires an additional 69 sq ft of warehouse space to support the distribution needs of that household. City of Edinburgh Council informed the Scottish Government in May 2021 it considers a total of 48,125 homes will need delivered over the next 10 years, which equates to 4,812 homes a year. This suggests the city requires 332,028 sq ft additional warehouse distribution space each year to accommodate that household growth or 3.32 million sq ft over the next decade.

Based on existing housing allocations within the adopted Edinburgh Local Development Plan, there will be nearly 1500 new homes being built on the western edge of South Queensferry over the next decade. These developments alone equate to the need for 103,500 sq ft of distribution space. There is insufficient employment land in South Queensferry to support these new homes, meaning that most residents will likely drive into Edinburgh or elsewhere for employment.

The Three Bridges Business Park is well located to not only serve the nearby new homes in South Queensferry but the strategic location close to Edinburgh and combined with such good motorway access, mean it could readily serve the whole of the Lothians and southern Fife.

## **Wester Hailes**

### AEW (0524)

Generally support key policy aims and objectives and suggest minor modification to wording to maintain longer term flexibility based on a regeneration framework and masterplan for delivering residential led mixed use development at Westside Plaza, Wester Hailes.

Support the primary principles of brownfield allocations for housing and supporting restraint on further greenfield release.

A specific and additional Place Based Policy is promoted and should be considered to encourage a wider regeneration framework for a new Town centre for Wester Hailes based on the existing Westside Plaza and extending across Murrayburn Road to the Union Canal.

This should embrace a similar policy response to the Gyle Shopping Centre and should recognise the local place based initiatives across the wider Wester Hailes area and the potential redevelopment opportunities to re-imagine Westside Plaza as a new town centre and to encourage housing-led redevelopment opportunities.

The policy should aim to promote a higher density of development around a key transport node as part of a central and accessible area serving the wider community to contribute towards realising the long-term vision for regeneration for the wider Wester Hailes area and to act as a key commercial focus.

Key policy initiatives should be consistent with emerging themes in NPF 4 including:

- Renewed emphasis on opportunities for redeveloping brownfield, vacant and derelict land and buildings can be used. It is also recognised that brownfield sites can alternatively make contributions to restoring biodiversity.
- Renewed support of a place based approach to design, and support for the 20-minute neighbourhood, in which basic needs should be within a 20-minute journey of the home.
- A renewed emphasis on creating sustainable places that are liveable, productive and distinctive.
- An update of the Scottish Government's six qualities of successful places (designed for lifelong health and wellbeing; safe and pleasant; well-connected and easy to move around; distinctive; sustainable (including support of net zero); and adaptable).
- An emphasis on the need for blue and green infrastructure with local development plans required to identify and protect blue and green infrastructure, including provision for new or improved access to play and outdoor sports opportunities.
- Reducing the need for unsustainable travel, in that local development plans must prioritise allocations to areas that can be accessed by public transport or active travel. Strong emphasis that developments which encourage reliance on the private car should not be supported.

Westside Plaza Shopping Centre is one of a number of core community facilities and the main commercial centre for Wester Hailes. It is located adjacent to the Wester Hailes Railway Station and is a 1960s covered mall that is accessible by a variety of modes of transport with good pedestrian links to the surrounding area, a bus terminus, railway station and extensive car parking.

It lies to the south of the Union Canal that provides an active green corridor west and east.

The council has an important role to play both in terms of adjacent land ownership and in directing future development via a positive policy context.

Recent engagement and discussion with City of Edinburgh Council has explored the potential for a regeneration strategy and vision and this should now be referenced as part of that core Place based policy in City Plan. Representations were not made at Main Issues Report stage as discussion with City of Edinburgh Council had not started at that time. Since then there has been significant momentum as part of the wider placemaking and community based planning initiatives but there is no local policy hook to encourage a more joined up approach to regeneration.

This should be recognised in the evolution of a specific place based policy promoted through City Plan 2030.

The existing Proposals Map simply defines the extent of the centre and does not reflect the wider regeneration projects within Wester Hailes. The Neighbourhood Plan, other masterplan initiatives and community partnership projects should inform a more cohesive and positive response to the Wester Hailes Local Centre to provide a positive framework and policy response for regeneration.

A specific and additional Place Based Policy is promoted and should be considered to encourage a wider regeneration framework for a new Town centre for Wester Hailes based on the existing Westside Plaza and extending across Murrayburn Road to the Union Canal.

This should embrace a similar policy response to the Gyle Shopping Centre and should recognise the local place based initiatives across the wider Wester Hailes area and the potential redevelopment opportunities to re-imagine Westside Plaza as a new town centre and to encourage housing-led redevelopment opportunities.

### **Former Clydesdale/Clelands Garage, Davidsons's Mains**

The Davidson's Mains and Silverknowes Association (0454)

Former Clydesdale/Clelands garage site in Davidsons's Mains should be identified as a development site as it has implications for the planning of schools.

### **Modifications sought by those submitting representations:**

#### **Midmar Paddock**

The Friends of Midmar Paddock, Edinburgh (0121), Dr Christopher Masters (0061), Roger Vander Steen (0175), Andrew Gray (0388), Lorraine Peterson (0226), Ian Rankin (0235), Caroline Ecans (0398), Dr Christopher Masters (0061), Nicholas Hepworth (0052), Mrs Katherine Claire Taylor (0010), Norman Angus (0233), Jane Dudman(0563), Scott Gibson (0652), Judith Webber (0104), Malcolm MacLachlan (0322), Jay Chimo (0674), Peter Fantes (0319), Graeme Parry (0230), Richard Maguire (0119), Gordon Mackenzie (0234), Derek Mitchell (0171), Anne Wellman (0229), George W S Heatley (0009), Donald R.

MacLeod (0525), David Price (0224), Catherine Riddle (0236), Alistair Cant (0397), Alex Inglis (0330), Jan Hulme (0420), Arnold Myers (0758), Robert Cochran (0227), Gordon Rintoul (0288), Michael Davies (0554), Luke Robertson (0114), Sarah Muirhead (0329), Serena Smith (0201), Russell Gray (0444), Michael Struthers (0606) Michael Adrian Hall (261), Malcolm McGechan (0202), Ally Williamson (0381), Donald Macaulay (0188), Sean Walker (0116), Ben Gillett (0324), Peter Fantes (0319), Ian Ross (0423), Kathryn Poolman (0574), Michael Poolman (0572), John Gee (0325), Christopher J Inchley (0102), Elizabeth Clapham (0038), Prof D N Bateman (0004), Mrs Daphne Torrie (0449) Fiona MacLeod (0505)

No modification specified.

Margaret Meiklejohn (0040), William Brotherston (0754), Neil Ross (0610), Patricia Willder (0205)

Modify Spatial Strategy Map (Map 1) to show Midmar Paddock as a dedicated green space not to be built on.

Fiona Riddoch (0070)

Modify Spatial Strategy Map (Map 1) to show Midmar Paddock as part of the Blackford and Hermitage green belt.

Goff Cantley (0032), Fiona MacLeod (0505)

No modification specified.

### **Braid Hills**

The Friends of Midmar Paddock, Edinburgh (0121), Ian Rankin (0235)

Modify paragraph 1.7 to state Braid Hills is a place where development should not happen.

### **106-114 Dundas St (Centrum House)**

New Town Dundas Street Residents (0795)

No modification specified.

### **Highfield Gilmerton**

Nigel Baillie (0093)

No modification specified.

### **Land between Cramond Road North and Cramond Road South**

Gavin Sears (0405)

No modification specified.



### **Torphin Road in Colinton**

Judith McLean (0794)

No modification specified.

### **Russel Road**

Russell Road Edinburgh Ltd (0739)

Modify the Plan to include a Place policy for the Russell Road site for housing led mixed use development.

### **New Mart Road, Chesser**

Watkin Jones Group / New Mart Road Limited (0593), Watkin Jones Group (0516)

Modify the Plan to include a Place policy for the New Mart Road site for mixed use development.

### **Glenogle Road**

Abrdn (0425)

Modify the Plan to allocate the Genogle site as a housing proposal with the following changes;

- Map 2 Spatial Strategy (Technical) (p.10) should be amended to identify Abrdn's site at Glenogle Road as a new housing led development.
- The Proposals map should be amended to identify Abrdn's site at Glenogle Road as a housing proposal.
- Part 4 Table 2 – Housing Proposals should be amended to include Abrdn's site at Glenogle Road as a housing proposal.

### **Tesco – Davidsons Mains**

Redline Planning Services Ltd (0673)

Modify the Plan to identify the site at Davidson Mains as a development opportunity and include allocation in Table 2 of Part 4 as capable of accommodating c.100 units.

### **Tesco – Broughton Road**

Redline Planning Services Ltd (0673)

Modify the Plan to identify the opportunity for high density residential development above the existing Broughton Road store and car park.

### **Tesco – Corstorphine**

Redline Planning Services Ltd (Tesco) (0673)

Modify the Plan to identify the site at Corstorphine as a development opportunity and include allocation in Table 2 of Part 4 as capable of accommodating 24 units.

### **Tesco - South Gyle**

#### Redline Planning Services Ltd (Tesco) (0673)

Modify Plan to identify the Tesco landholding at South Gyle within Table 2 of Part 4 for c.400 as a specific housing led mixed redevelopment opportunity and by making the following changes;

- Amend Place based requirement c) on page 77 to read: "Housing as a component of business-led mixed-use proposals, unless it can be demonstrated that a housing-led mixed-use proposal is more appropriate."
- Identify the Tesco landholding at South Gyle as a specific "housing-led mixed redevelopment" opportunity within parcel EP4 on map 26, page 78. EP4 should also be separately identified in the associated key, distinct from EP3.
- Reword the criterion to say: "In EP4, commercial and mixed-use proposals (including residential-led proposals) will be supported. Where practicable, development should provide increased permeability, create a direct relationship with South Gyle Broadway and improve the pedestrian and cycling environment along South Gyle Crescent".

#### BDW Trading (0350)

Modify Place 19 to state; "housing as a component of business-led mixed-use proposals, **UNLESS IT CAN BE DEMONSTRATED THAT A HOUSING-LED MIXED USE PROPOSAL IS MORE APPROPRIATE.**"

Modify Place 19 so that EP4 is distinguished from EP3, and the following reference made to EP4:

- "BUSINESS OR HOUSING-LED REDEVELOPMENT"

We would emphasise that we support the principles which are identified for sites EP3-5 on page 79, and in turn this is consistent with the amendments we are recommending above i.e.

a. proposals should incorporate a mix of business and residential uses and create an element of active commercial frontage onto South Gyle Broadway.

b. a mixed-use development provides the opportunity to create new pedestrian and cycle routes through the site.

c. in EP 3 and EP 4, commercial and mixed-use proposals will be supported. Where practicable, development should provide increased permeability, create a direct relationship with South Gyle Broadway and improve the pedestrian and cycling environment along South Gyle Crescent.

d. EP5 should remain in predominantly business and industrial use. Where opportunities arise, consideration should be given to improving accessibility for pedestrians and cyclists.

### **Lothianburn**

#### Hillend Leisure Ltd (0080)

Modify the Plan to identify the Pentland Trail Centre with an appropriate allocation boundary.

### **Land at the Wisp**

#### E&A Partnerships Ltd & Niddrie Development Company Ltd (0753)

Modify the Plan to identify the site at the Wisp for a residential development allocation in Table 2.

### **Three Bridges Business Park**

#### Aisby Enterprises (0479)

Modify the Plan to identify the proposed Three Bridges Business Park as an Area of Economic Importance and include a new Place based policy as follows;

Place 24 – Three Bridges Business Park, South Queensferry

Business, industrial and storage and distribution uses (Classes 4,5 and 6) along with ancillary development will be supported within the boundary shown on the Proposals Map provided proposals are compatible with the function of the site, and accord with other relevant local development plan policies.

This policy supports the future development of this site for economic development purposes, in recognition of its ideal strategic position for road access to the whole of Scotland.. Proposals will also be assessed against other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity.

### **Wester Hailes**

#### AEW (0524)

Modify Plan to include a place policy for Wester Hailes Westside Plaza. It should state that planning permission will be granted for development within the boundary of Westside Plaza (extended to the north to the canal) on the Proposal Map, for development which:

- maintains its role as a key commercial and retail centre serving the wider community;
- encourages housing led redevelopment opportunities of all tenures and introduces a wider mix of uses.

The requirements in principle will be for:

- a) comprehensively designed proposals which maximise the development potential of the area
- b) development for different forms of housing as part of mixed-use proposals,
- c) provision of, or contribution towards education, healthcare and community infrastructure,
- d) the creation of a new urban quarter adjacent to Wester Hailes railway Station
- e) a flexible review of the existing open space allocations of previously 'left over' land with limited amenity value at present.
- f) improved pedestrian and cycle links through the area to provide strong, safe connections with services as part of the wider West Edinburgh Active Travel Network (WEL)
- g) refocusing public transport interchange to better integrate with the railway station, shopping centre and to reduce physical barriers to movement
- h) Enhance cycle parking

### **Former Clydesdale/Clelands Garage, Davidsons's Mains**

The Davidson's Mains and Silverknowes Association (0454)

Identify former Clydesdale/Clelands garage site in Davidsons's Mains as a development site.

### **Summary of responses (including reasons) by planning authority:**

#### **Non-Allocated Sites or not Housing Proposals**

#### **Midmar Paddock**

The Friends of Midmar Paddock, Edinburgh (0121), Dr Christopher Masters (0061), Roger Vander Steen (0175), Andrew Gray (0388), Lorraine Peterson (0226), Ian Rankin (0235), Caroline Ecans (0398), Dr Christopher Masters (0061), Nicholas Hepworth (0052), Mrs Katherine Claire Taylor (0010), Norman Angus (0233), Jane Dudman(0563), Scott Gibson (0652), Judith Webber (0104), Malcolm MacLachlan (0322), Jay Chimo (0674), Peter Fantes (0319), Graeme Parry (0230), Richard Maguire (0119), Gordon Mackenzie (0234), Derek Mitchell (0171), Anne Wellman (0229), George W S Heatley (0009), Donald R. MacLeod (0525), David Price (0224), Catherine Riddle (0236), Alistair Cant (0397), Alex Inglis (0330), Jan Hulme (0420), Arnold Myers (0758), Robert Cochran (0227), Gordon Rintoul (0288), michael davies (0554), Luke Robertson (0114), Sarah Muirhead (0329), Serena Smith (0201), Russell Gray (0444), Michael Struthers (0606) Michael Adrian Hall (261), Malcolm McGechan (0202), Ally Williamson (0381), Donald Macaulay (0188), Sean Walker (0116), Ben Gillett (0324), Peter Fantes (0319), Ian Ross (0423), Kathryn Poolman (0574), Michael Poolman (0572), John Gee (0325), Christopher J Inchley (0102), Elizabeth Clapham (0038), Prof D N Bateman (0004), Mrs Daphne Torrie (0449) Rona Ferguson (0006), Goff Cantley (0032), Fiona MacLeod (0505)

Midmar Paddock is a small site in the Braid Hills. It forms part of the Edinburgh green belt and is designated as a special landscape area (Braids, Liberton, Morthall), a local biodiversity site, a local nature conservation site and an area of open space. The site has not been allocated for development in the Plan and no representations supporting development of the site have been received. The site continues to be protected within the plan. **No modification proposed.**

Margaret Meiklejohn (0040), William Brotherston (0754), Neil Ross (0610), Patricia Willder (0205)

Midmar Paddock is already identified as an area of open space. **No modification proposed.**

Fiona Riddoch (0070)

Midmar Paddock is a small site in the Braid Hills. The purpose of Map 1 Spatial Strategy is to present the Plan's strategy at a high level through the use of an illustrative and conceptual map. The Council considers it would be inconsistent and inappropriate to highlight one small site on the spatial strategy map. **No modification proposed.**

Goff Cantley (0032), Fiona MacLeod (0505)

Midmar Paddock is already identified as an area of open space. **No modification proposed.**

## **Braid Hills**

The Friends of Midmar Paddock, Edinburgh (0121), Ian Rankin (0235)

Paragraph 1.7 forms part of the introduction to the Plan and sets out the purpose and content of the Plan. It would be inconsistent and inappropriate to refer specifically to the Braid Hills in this paragraph. **No modification proposed.**

New Town Dundas Street Residents (0795).

The Council notes the point raised. **No modification proposed.**

## **Highfield Gilmerton**

Nigel Baillie (0093)

The Highfield site is within the Edinburgh Green Belt and a special landscape area. The site has not been allocated for development in the Plan although representations supporting development of the site have been received (Taylor Wimpey 200). The Council does not agree with representations that the site should be allocated for development. **No modification proposed.**

## **Land between Cramond Road North and Cramond Road South**

Gavin Sears (0405)

The site is to the North of Cramond Road North, is designated as an area of open space and has been identified as a Green Blue Network Proposal (BGN26). The area has not been allocated for development in the Plan and no representations supporting development of the site have been received. **No modification proposed.**

### **Torphin Road in Colinton.**

Judith McLean (0794)

The site is within the Edinburgh Green Belt, the Pentland Hills Regional Park, an area of open space and special landscape area. The area has not been allocated for development in the Plan and no representations supporting development of the site have been received. **No modification proposed.**

### **Russel Road**

Russell Road Edinburgh Ltd (0739)

The Russell Road site is located on the southeast of corner of the industrial estate. It is within the Edinburgh built up area and therefore the relevant policies apply. The site was assessed in the Housing Study (CD026) as a potential housing led development allocation. The site scored well in the study, however, at that time the Council decided that it should be retained in business use. Proposals for mixed use housing development could still be promoted through the planning application process as the site is within the Urban Area. Key considerations would be to address the impacts with wider uses on the industrial estate, and to achieve an adequate residential amenity particularly in the context of the adjacent railway lines and the western approach road. **No modification proposed.**

### **New Mart Road, Chesser**

Watkin Jones Group / New Mart Road Limited (0593), Watkin Jones Group (0516)

The New Mart Road site is located within the Chesser Avenue local centre in the Plan, which remains unchanged from its allocation in the adopted LDP. Site is in use for leisure purposes. The Council did not assess the site in the Housing Study (CD026) as it was an active leisure use within a local centre at the time. Therefore, the site was not considered for allocation. As the Council does not propose allocating the site there is no need to prepare a Place Policy. Proposals for mixed use housing development could still be promoted through the planning application process against relevant policies as the site is within the built up area, however, the Council does not support a formal allocation of the site. **No modification proposed.**

### **Glenogle Road**

Abrdn (0425)

The site is currently in office use. It is located in the urban area next to the Water of Leith. The site was assessed by the Council, however, the Council took a decision not to formally allocate the site within the plan following consideration of the findings of the Strategic Flood Risk Assessment (CD011) as it identified the site at risk of fluvial and surface water flooding. Proposals for mixed use housing development could still be promoted through

the planning application process and considered against relevant Plan policies as the site is within the built up area, however, the Council does not support the formal allocation of the site for the reasons set out. **No modification proposed.**

### **Tesco – Davidsons Mains**

Redline Planning Services Ltd (Tesco) (0673)

The site is currently the location of an existing supermarket, is located within the urban area and is part of a local centre. The site was not assessed by the Council in the Housing Study (CD026) as the site was in active use as a supermarket. The Council considers proposals for housing development above the retail unit should be promoted through the planning application process and considered against relevant Plan policies as the site is within the built up area, however, the Council does not support the formal allocation of the site. **No modification proposed.**

### **Tesco – Broughton Road**

Redline Planning Services Ltd (Tesco) (0673)

The site is currently an existing supermarket, located within the urban area. The site was not assessed by the Council in the Housing Study (CD026) as it was in active use as a supermarket. The Council considers proposals for housing development above the retail unit should be promoted through the planning application process and considered against relevant Plan policies as the site is within the built up area, however, the Council does not support the formal allocation of the site. **No modification proposed.**

### **Tesco Corstorphine**

Redline Planning Services Ltd (Tesco) (0673)

The site is to the west of Meadow Place Road was formerly a car park. It is adjacent to a police station and a retail unit. The site has been granted planning permission for housing and work has begun on site. As a result the Council considers the formal allocation of the site unnecessary. **No modification proposed.**

### **Tesco - South Gyle**

Redline Planning Services Ltd (Tesco) (0673), BDW Trading (0350)

Edinburgh Park is identified as a Strategic Business Centre (SBC) in the Plan. Place Policy 19 supports development which maintains the strategic role of the area and supports a wider mix of uses. The Policy sets out a series of development principles to guide development of the SBC as a whole. Principle b states that development for office and other business uses should be part of mixed-use proposals. In addition, principle c states that housing is supported as part of business led-mixed use development proposals. The office is within area EP4. The policy sets out specific development principles to cover the EP3-5 areas. Criterion a states that proposals should incorporate a mix of business and residential uses and create an element of active commercial frontage onto South Gyle Broadway. The Council considers that the Plan is supportive of residential development as part of business led-mixed use development. Such an approach reflects the

importance of Edinburgh Park as a Strategic Business Centre, where development should maintain its strategic role. Therefore the Council considers that it is unnecessary to allocate the site for housing. As a result, the Council does not accept the proposed changes to the development principles. The Council does not accept there is a shortfall in the housing land supply and sets out its position in detail in its responses in Issue 19: Housing Supply Target and Land Requirements and Issue 20: Assessment of the Housing Land Supply. **No modification proposed.**

### **Lothianburn**

#### Hillend Leisure Ltd (0080)

The site is within the Edinburgh green belt, the Pentland Hills Regional Park, an area of open space and a special landscape area. Part of the site is with a conservation area (Swanson)

The Council does not consider there is a need to identify the Pentland Trail Centre as a proposal in the plan and sets out its position in detail in Issue 18 - Blue Green Network Proposals. **No modification proposed.**

### **Land at the Wisp**

#### E&A Partnerships Ltd & Niddrie Development Company Ltd (0753)

This site is within the urban area. It was historically a colliery spoil heap. The Council did consider this site, however, it reached a decision that there may be particularly high costs of remediation on this site and therefore it was dropped from consideration. This decision was influenced by the fact that two recent applications for pre application advice related to this site were withdrawn before an opinion could be finalised. In addition, there was a previous application (CD175) where the Council were minded to grant consent (03/02034/FUL for 284 units) which approved the principle of housing but the legal agreement required was never concluded. The planning committee report states there is serious concern that the decontamination of the land may not ultimately prove satisfactory. Committee were asked to approve the principle of housing subject to a suspensive condition requiring full satisfaction of Environmental Protection before construction takes place. The report also suggests that given the critical nature of the site decontamination, it is suggested that the conclusion of engineering reports and works on site should be presented back to Committee.

The Council considers proposals for housing development should be promoted through the planning application process and considered against relevant Plan policies as the site is within the built up area, however, the Council does not support the formal allocation of the site for the reasons set out. **No modification proposed.**

### **Three Bridges Business Park**

#### Aisby Enterprises (0479)

The site is split into two areas, north and south of the A904. The site to the north (site A) is within the Countryside policy area. The site to the south (site B) is partly in the Edinburgh Green Belt and partly within the countryside policy area.



The Council considers there is a plentiful supply of land for employment purposes identified in the Plan, and an extension (40.3ha) to the West of Newbridge Industrial Estate has been identified to accommodate businesses having to relocate as a result of the development of brownfield sites. The Council has set out its position in detail in its responses in Issue 3: Delivery of the Strategy.

A Housing Study (CD026) prepared by the Council was prepared to inform the preparation of Choices for City Plan 2030 (CD022). An assessment of all greenfield land was undertaken to assess which land had development potential while still contributing to the SDP1 spatial strategy, minimising the effect on landscape character and making best use of existing infrastructure. The methodology (Part 2b, Figure 1, p 3) was prepared to allow sites to be assessed in a consistent manner and to enable sites to be subject to comparative analysis. The results of this work allowed the Council to identify its preferred greenfield sites should any be required. However, the Council considered the most sustainable option was its preferred approach at the MIR stage, that new allocations to support the housing land supply should be directed to brownfield rather than greenfield sites. Although the study was prepared for the purposes of identifying sites for housing, it still provides useful information to assess the suitability of sites at Queensferry for commercial purposes.

Site A was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology and the results are on p303. The Council considers its assessment of sites to be consistent and robust. The site is in greenfield sector 6, within the East of Headrig Road area. The Housing Study found the area was not within walking distance of local convenience services or employment clusters, did not have access to the wider cycle network and was unlikely to improve and did not support travel by public transport. The study considered the area had no scope for development due to it being beyond the robust settlement boundary formed by the approach road to the Queensferry Crossing and the effect of development encroaching on what appears to be open and well managed countryside.

Site B was not identified as a preferred location in the Council's Housing study as it did not score well under the assessment methodology; the results are on p305. The site is also in greenfield sector 6, within the West of Dundas House area. The Housing Study found the area was not within walking distance of local convenience services or employment clusters, did not have access to the wider cycle network and was unlikely to improve, and did not support travel by public transport. The study considered the area had no scope for development due to the effect any development would have on the strong rural and secluded character of this area, conflicting with the existing local settlement pattern.

Although the proposed sites have good access to the motorway network they are very rural in nature and the Council does not consider these sites to be a sustainable location where it would support new employment land. In addition, the Council considers there is sufficient employment land across the Edinburgh area to meet the city's requirements. As a result, for the reasons set out above the Council does not support the allocation of these sites. **No modification proposed.**

**Wester Hailes**

#### AEW (0524)

Although the Plan does identify a housing led mixed use development next to Wester Hailes local centre (H82) it is an isolated development. The Council has commissioned masterplanning for regeneration in the wider area and the community has been preparing a local place plan. As a result the Council does not consider it would be appropriate to allocate this site and prepare a place based policy at this time. Policy within the plan is supportive of office development in Policy Econ 3 in designated centres, including local centres. In addition, Policy Econ2 is supportive of housing within proposed commercial developments if the site is larger than 0.25ha. Therefore, proposals for mixed use development, including residential, could be considered in principle as being consistent with the requirements of the plan. The Council considers there is no requirement for this specific proposal to be included within the plan as its not required in order to deliver the development plan strategy and that the proposal could be promoted through a planning application and be considered against the existing provisions of the Plan. **No modification proposed.**

#### **Former Clydesdale/Clelands Garage, Davidsons's Mains**

##### The Davidson's Mains and Silverknowes Association (0454)

The site is within the Davidsons Mains Local Centre. Policy Re 5 supports retail development in this location. Non- retail development may be permitted if it does not have a detrimental impact on the function of the centre. The Council considers proposals for housing development in this location should be promoted through the planning application process and considered against relevant Plan policies. The Council does not support the formal allocation of the site due to its location within a local centre. **No modification proposed.**

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

Issue 11	Design and Placemaking	
Development plan reference:	Env 1 - Env 5, Env 25 - 30, Env 33 - 34, Env 38, 'Sustainable city (pg15-25)'	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Archie Clark (0003)</div> <div>AREAA (0358)</div> <div>Aviva Life and Pensions UK Limited (0598)</div> <div>Barratt David Wilson Homes (0677)</div> <div>BDW Trading (0350)</div> <div>CALA Management Ltd (0465)</div> <div>CBRE Global Investors (0644)</div> <div>Cockburn Association (0777)</div> <div>Cordatus Property LP (0533)</div> <div>Corstorphine Community Council (0799)</div> <div>Crosslane Co-Living SPV 2 Limited (0687)</div> <div>Crosswind Developments Ltd (0184)</div> <div>Crown Estate Scotland (The Forth District Salmon Fishery Board) (0346)</div> <div>Dandara East Scotland (0757)</div> <div>Edinburgh Airport Limited (0761)</div> <div>Edinburgh Airport Noise Advisory Board (0691)</div> <div>Edinburgh Dog and Cat Home (0310)</div> <div>Edinburgh World Heritage (0339)</div> <div>Elgin Haymarket Limited (0292)</div> <div>Forth Ports Limited (0496)</div> <div>Grange/Prestonfield Community Council (0192)</div> <div>Hallam Land Management (0599) (0615)</div> <div>Hazledene House Limited (0695)</div> <div>Homes for Scotland (0404)</div> <div>Juniper Green &amp; Baberton Mains Community Council (0306)</div> <div>Juniper Green &amp; Baberton Mains Community Council (0306)</div> <div>Leith Central Community Council (0614)</div> <div>Leith Harbour and Newhaven Community Council (0776)</div> <div>Liberton &amp; District Community Council (0084)</div> <div>Living Streets Edinburgh Group (0486)</div> <div>LPBZ Commercial Ltd (0391)</div> <div>Mark Ockendon (0419)</div> <div>Melford Developments Ltd (0308)</div> <div>Miller Homes Limited (0649)</div> <div>Mr T Klan (0307)</div> <div>National Grid (0805)</div> <div>NatureScot (0528)</div> <div>New Town &amp; Broughton Community Council (0254)</div> <div>Nuveen Real Estate (0560) (0734)</div> <div>Parabola Edinburgh Limited (0723)</div> <div>Pawel Stankiewicz (0445)</div> <div>Peter Allen (0336)</div> <div>RSPB (0648)</div> <div>SAICA (0590)</div> <div>Scottish Wildlife Trust Lothian group (0564)</div> <div>SEPA (0012)</div> <div>Southside Community Council (0781)</div> <div>Steve Loomes (0767)</div> <div>Stewart Milne Homes (0118)</div> <div>Stirling Developments Limited (0303)</div> <div>Suzanne McIntosh (0409)</div> <div>Suzie Ross (0440)</div> <div>Tarmac (0244)</div> <div>Taylor Wimpey (0200)</div> <div>The Association for the Protection of Rural Scotland (0334)</div> <div>The Royal London Mutual Insurance Society Ltd (0149)</div> <div>Water of Leith Conservation Trust (0392)</div> <div>Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	These policies set out criteria to be considered in the design of new development	
Planning authority's summary of the representation(s):		

## **Env 1 - Design Quality and Context**

Wright PDL (0078), Stirling Developments Limited (0303), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

It is stated design should draw upon positive characteristics of the surrounding area, however this conflicts with the density requirements of this Plan, particularly in suburban/urban edge areas.

Living Streets Edinburgh Group (0486)

The policy should be amended.

Edinburgh World Heritage (0339)

The policy should be amended to protect and enhance the Outstanding Universal Value of the World Heritage sites and the many benefits this brings. To also be helpfully clear that understanding and reinforcing positive local characteristics is important to achieving good design.

## **Env 2 - Co-ordinated Development**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

No consideration of developments in progress and previously approved developments that are yet to be commenced. Only by incorporating all of these can a true and full picture be formed.

The Royal London Mutual Insurance Society Ltd (0149)

Paragraph 3.86 should be modified.

Wright PDL (0078), Homes for Scotland (0404), Stirling Developments Limited (0303), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

It is indicated the extent to which Briefs are required under this policy is excessive and Briefs should be focused on large scale strategic sites. Statutory pre-application consultation is already required for major developments and detailed design policies are already included in the plan. Community engagement can also serve to raise expectations about what is deliverable in practice.

The policy should make clear it is essential that developers and landowners are involved in the creation of design briefs since the financial viability of an allocation is dependent on the type, design, and marketability of new homes - if a site is not financially viable then it is not deliverable.

There also needs to be a willingness to work with the grain of existing land ownerships as much as possible to avoid complications and delay given problems that arise from linking development to land outwith the control of the developer.

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350)

It lacks clarity and is not clear in what circumstances the following text would apply:

*“where the Council considers that such a master plan, strategy, guidance or Brief is needed as part of, or prior to, the submission of any planning application”*

It appears to give the Council the power to apply the policy as it sees fit, rather than outlining precisely where the policy would apply so that there is certainty for would be developers if it would be applied to their site or not.

Stewart Milne Homes (0118), Crosswind Developments Ltd (0184), Taylor Wimpey (0200), Edinburgh Airport Limited (0761)

This policy is likely to create excessive uncertainty and disproportionately delay development, particularly due to criterion b.

If a collaborative masterplan is required involving multiple land owners/interests, there is no certainty that this will be achieved and this could therefore stymie development.

17 of the 36 Place Policy locations require a Place Brief prepared by the Council and/or an approved master plan. The Council has had issues in the past with bringing forward guidance and development briefs in a timely fashion. This will require a very significant amount of staff resource and it is not clear how all of these can be progressed without significant delay to delivery. It is therefore not clear that development in advance of such documents should be refused on this basis alone.

New Town & Broughton Community Council (0254)

Recent experience of piecemeal proposals for the Beaverhall area has shown it would have been helpful if a Place Brief had been prepared by the Council, consulted on and agreed with local residents prior to the many applications for the area. Failing to do this could result in uncoordinated developments in the area to the detriment of current residents and businesses.

The above approach is preferable, certainly as a first step, to the unclear statements within the footnotes to this policy regarding the Council using its powers of compulsory purchase to assemble a site for (re)-development.

Cockburn Association (0777)

The policy should be amended.

Melford Developments Ltd (0308), Edinburgh Dog and Cat Home (0310)

The policy wording seeks to prevent development which “may” compromise comprehensive development. This is considered unclear and an unreasonably high test. As worded, this policy could prevent any planning applications coming forward for proposals, however small.

For example it would discourage Edinburgh Dog and Cat Home (EDCH) bringing forward proposals to upgrade its existing facility at Seafield Road East in situ (whether it is within or outwith the Housing Proposal H55 area) given the need for the Seafield Place Brief to be approved first.

The proposed policy Env 2 is considered unreasonably restrictive on EDCH and could prevent development that would benefit the wider community. It should be amended so that EDCH can be confident of bringing forward proposals to upgrade its site in a manner where it would not hinder the wider Seafield development (Housing Proposal H55).

LPBZ Commercial Ltd (0391)

There is no definition of “effective development” and therefore the potential approval or rejection of planning applications is open to the interpretation of the wording of this policy and that it would be extremely difficult to ensure compliance as part of a planning application. There are no examples given or criteria provided as to when it would be considered that a development would “compromise” the comprehensive development and regeneration of a wider area.

The threat of compulsory purchase adds further to these concerns as it appears that if land is not developed for a use which is considered acceptable to the council, it could be at risk of being compulsory purchased.

This policy is at odds to Scottish Planning Policy which states Local Development Plans should “support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area”. Policy ENV2 restricts any flexibility in terms of allowing an existing business to expand if that development is not considered by the council to ensure the effective development.

CALA Management Ltd (0465), Hallam Land Management (0599) (0615), Miller Homes Limited (0649)

The policy should be amended. It should allow an applicant to demonstrate how its proposal fits in with the overall development of the surrounding area.

This more flexible approach still allows the Council to help facilitate the comprehensive approach to redevelopment and regeneration which it is seeking.

This change in wording also helps an applicant submit the relevant details in its submission, avoiding the risk of delay in determination and possibly the need to avoid imposing a specific condition.

Forth Ports Limited (0496)

Object to the use of Compulsory Purchase Order Powers (CPO) to deliver the Council's brownfield housing delivery strategy. The potential for their use in relation to the Port of Leith, which is wholly owned and controlled by FP, would have serious and permanent implications for the Port. We explain below why the use of CPO would be inappropriate in relation to the Port of Leith.

Forth Ports Ltd is a port infrastructure organisation and will continue to operate as such, utilising its land holdings for port related uses, unless it considers any land within its ownership is no longer required for operational use.

### **Env 3 – Development Design – Incorporating and Enhancing Existing and Potential Features**

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

It is unreasonable to expect developments to enhance features that are in the surrounding area and not on the site itself or within the control of the applicant. Surrounding area is too broad a term and could lead to unreasonable expectations. The supporting text does not relate to features off site.

NatureScot (0528)

The policy requirement that permission will be granted where “it is demonstrated that existing characteristics and features worthy of retention on the site...” is too subjective

National Grid (0805)

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure. National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.

Edinburgh World Heritage (0339)

3.88 should be amended to more explicitly refer to the historic environment

### **Env 4 - Development Design – Impact on Setting**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

Homes for Scotland members already design developments according to the setting of the site, including through identifying an appropriate density.

These are matters to be assessed on a site-by-site basis. The Policy wording does not allow for sufficient flexibility to consider specific site circumstances. Green and blue infrastructure for example can be difficult to deliver on smaller and brownfield sites.

It is unclear how policy Env 4 can be reconciled with the stated density requirements.

Tarmac (0244), AREAA (0358), CALA Management Ltd (0465), Hallam Land Management (0599) (0615), Miller Homes Limited (0649)

Requiring a ‘positive impact’, as the wording currently proposes makes compliance too

restrictive and subjective. The standard environmental, landscape and heritage assessment practice is the minimum requirement should be a neutral impact, or no detrimental impact. Alternatively an impact could be accepted where sufficient mitigation is proposed.

Even Env 11 (Listed Building – Setting) has more balanced language than Env 4 i.e. avoiding detrimental. The implication is that development within and affecting an area of 1960's flatted properties would be held to a higher impact assessment standard than those within the grounds of an A-Listed building.

Where an impact is positive is subjective and potentially impossible to achieve in certain circumstances.

This is particularly important in the context of achieving the most efficient use of the city extent by maximising the development potential of land within.

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

Object to Policy ENV4 on the basis that it sets unreasonable expectations on the developer and implies that the developer is responsible for land outside of their ownership

Elgin Haymarket Limited (0292)

This policy should be amended.

Stirling Developments Limited (0303)

The policy should allow for more flexibility and allow for site-by-site basis of the considerations, particularly in terms of green blue infrastructure which can be difficult to deliver on smaller and brownfield sites.

Does this policy takes priority over Env 26 (Housing Density) since these policies will often not be able to be reconciled.

Melford Developments Ltd (0308)

Presently the policy is imprecise, value laden and subjective.

AREAA (0358)

Policy should be amended.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

This policy requires an applicant to demonstrate a positive impact however it does not define a magnitude of effect or impact to be justified, nor the information required relating to the degree of impact. It is unclear how a developer will be able to demonstrate that its development will have a positive impact) on an existing view. It is also unclear how the Council would determine this.



Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

Policy Env 4 / Paragraph 3.90 should be modified.

Edinburgh Word Heritage (0339)

The policy should be modified to protect and enhance the Outstanding Universal Value of the World Heritage sites and the many benefits this brings Also to clarify that development not only needs to have a positive impact (which can be loosely interpreted), but should reinforce what is positive about its context specifically.

### **Env 5 Alterations, Extensions and Domestic Outbuildings**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The policy should be amended as it is unclear how monitoring and measurement will take place in relation to green and blue infrastructure.

Suzie Ross (0440)

The proposed policy guidelines are too subjective and allow decision maker's too much discretion.

Scottish Wildlife Trust Lothian group (0560)

The policy should be modified.

Cockburn Association (0777)

This policy should address private car parking as it damages character and affects streetscape

Edinburgh World Heritage (0339)

The policy should be modified.

### **Env 25 – Layout Design**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

This policy should make clear which policy areas will the planning officer give precedence to when determining a planning application, particularly given the objectives of this policy as compared to the density aspirations of this Plan? For example in relation to Env 26 versus Env 27 versus Env 30 versus Env 31 versus Env 32.

Mark Ockendon (0419)

The policy should recognise that car transport is necessary given the Scottish climate whilst still promoting alternatives.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

With regard to criterion b. there will be many examples where direct connections are not possible due to lack of control over adjacent land ownership. There are examples around the periphery of the City where the requirement to define defensible Green Belt inner boundaries has led to the creation of tree belts. These greenspaces have now been transferred to third parties and are not in the control of an applicant. This inhibits simple direct path and road connections on the outer edge of the City as the City grows.

With regard to criterion g., all public views by their nature will be attractive but do not require to be preserved. New development can create an alternative and equally attractive public view. The Council has defined a series of views which it wishes to retain for different reasons across the City. These are defined in the Council's Edinburgh Design Guidance (January 2020). These are the important views which need to be taken into account and safeguarded to protect the amenity of the City.

The policy should replace 'wherever' for 'where' to reflect the past history of creating defensible Green Belt inner boundaries on the City urban edge rather than permeable edges to facilitate connecting communities arising from the future growth of the City.

Living Streets Edinburgh Group (0486)

Modify this policy.

Corstorphine Community Council (0799)

This policy does not address 20 minute neighbourhoods or the need for lighting and overlooking.

Edinburgh Word Heritage (0339)

Modify this policy.

## **Env 27 - Public Realm, New Planting and Landscape Design**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

This policy does not address the increasing number of untidy and excessively high telecoms masts, sometimes duplicating masts in close proximity, as masts that do not have adequate regard to the environment can ruin the appearance of a place.

Edinburgh Airport Limited (0761)

This policy does not have sufficiently flexibility to apply variable standards in areas where it is important to minimise bird strike risk with aircraft in areas around the airport.

Edinburgh World Heritage (0339)

This policy should be amended.

## **Env 28 – Urban Edge Development**

### Tarmac (0244), Hallam Land Management (0615)

This policy should be modified.

The objective of this policy is appropriately covered by other policies.

Paragraph 3.148 suggests the policy is to protect green belt boundaries and objectives. However, the Proposed Plan policy has now removed any reference to the objectives of green belt area.

### The Association for the Protection of Rural Scotland (0334)

Make an addition to this policy.

### CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

This proposal conflicts with SESplan Policy 7: Maintaining a five year housing supply and SESplan Policy 12: Green Belts. None of these strategic policies require the LDP to conserve and enhance the landscape setting and special character of the City as set out in criterion a. of Policy Env 28. The requirement is to maintain the identity, character and landscape setting of the City not to conserve or enhance it. The SDP policies makes no reference at all to the City having a special character over and above any other settlement in the region and 'special' should be deleted.

Providing opportunities for access to the surrounding countryside is promoted by SESplan Policy 12 criterion d. This however is not the same as promoting access to the countryside if possible (criterion b. of Policy Env 28). It is proposed that appropriate is deleted and replace with possible to reflect that it is an opportunity and not a requirement.

Criterion c. requires a range of landscape and environmental improvements to strengthen the green belt boundary and contribute to other measures. Again, this requirement is not in accord with SESplan which has no policy directive to strengthen the green belt boundary in Edinburgh. SPP (2014) provides the policy direction to the Council about defining the inner boundary of the green belt. It is not about strengthening the boundary but about setting the boundary where visual boundary markers are defined by landscape features. Accordingly, criterion c. requires to be modified to accord with SPP (2014).

Defensibility of the green belt boundary is much more about selecting the appropriate landscape features to define the boundary rather than trying to strengthen boundaries defined by hedges and field enclosures or even the rear fences of back gardens.

### Crosswind Developments Ltd (0184)

The Crosswind site is not on the urban edge. Proposal H61 is clearly infill development and is bound by development at Edinburgh Airport, the Fife Rail Line and consented residential development at West Craigs beyond, Edinburgh Gateway Station, the Tram

Deport and the buildings of Castle Gogar and its surrounds. It does not border the Green Belt and this policy is not therefore relevant.

## **Env 29 – Waterside Development**

### LPBZ Commercial Ltd (0391)

This policy is too onerous and wide ranging. There are many bodies of water such as Albert Dock where recreational use would not be safe, practical or appropriate given the heavily industrial and operational uses to the north.

### NatureScot (0528)

There is a need for the plan to be more explicit on the actions required if climate change impacts on existing and new development are to be minimised. A key role for policies relating to flooding and the coast will be to require adaptation planning in our approach to development alongside the water environment.

Evidence from Dynamic Coast (CD135) shows that we will be facing some very challenging issues in future regarding flooding and coastal change. The importance of adaptation of communities and infrastructure is an essential matter for City Plan 2030 to consider and plan for.

An additional requirement is needed to emphasise the importance of assessing and designing in coastal change (e.g. coastal flooding and erosion) as part of good placemaking. The majority of Edinburgh's shoreline is engineered and protected but proposals must nevertheless be futureproofed in the shorter-term and designed for resilience and to minimise risk and costs for future residents and communities.

### Leith Central Community Council (0614)

This policy should be modified.

### Edinburgh Airport Limited (0761)

The airport's operational boundary follows the River Almond. Given the operational nature of the airport, it is not possible to undertake the requirements set out in Criteria A and B and flexibility is required to the policy to ensure certain developments are exempt from the requirements.

### Water of Leith Conservation Trust (0392)

Where in the Plan is the policy requirement for a 20m buffer along the water of Leith.

### Crown Estate Scotland (The Forth District Salmon Fishery Board) (0346)

The Forth District Salmon Fishery Board is tasked with the management of the salmon fishing assets within the Forth District forming part of The Scottish Crown Estate under Crown Estate Scotland's pilot delegation scheme.

In particular, we want to ensure that access to the riverbanks and thereby important salmon fishing interests are adequately provided for in the relevant Development Plan policies along with the ability for those interests to be freely enjoyed by those in whom the rights are legally vested. In receiving policy recognition, the fishing interests will then form a material consideration in the determination of planning applications in due course.

Crosswind Developments Ltd (0184)

The supporting text of Policy Env29 refers to the buffer zones to be provided along the water's edge to provide space for habitat creation as well as allowing fluvial and coastal processes to occur, including accounting for climate change and erosion (Page 115). With regards to Proposal BGN49 (Gogar Burn), the requirement for a buffer zone is contained within Part 4, Table 1 (Environment Proposals) of the plan and the supporting text should therefore reference this table to guide the reader accordingly.

**Env 30 - Building Heights**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Stirling Developments Limited (0303)

This policy conflicts with density requirements and it is not clear which takes precedence.

Crosswind Developments Ltd (0184)

Building to prevailing building heights may not be possible in light of the requirements of the Plan, such as the required density of 65 units to the hectare for housing developments, 20 % of the site to be useable open space etc.

The requirement for enhancement puts an unreasonable request upon the developer so a degree of flexibility is needed.

Consideration must also be given to airport safeguarding matters.

Melford Developments Ltd (0308)

This policy is not workable in a brownfield only context. Building heights will be inextricably linked to other policy requirements relating to density, open space, parking and amenity requirements. To have a viable brownfield development will likely mean taller buildings. Without a relaxation of this policy the brownfield only approach to house building will fail. This approach needs to be honest about the proposed urbanisation, densification and intensification of uses within the urban area.

Pawel Stankiewicz (0445)

This policy should be modified.

Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

The policy needs to have greater account for variable site and proposal circumstances.

Aviva Life and Pensions UK Limited (0598)

Be ambitious and flexible with this policy.

Leith Central Community Council (0614)

The concept of a development which enhances the skyline is too vague.

There is too much emphasis on the views of the city looking at itself.

Edinburgh World Heritage (0339)

To appropriately protect the Outstanding Universal Value of the World Heritage Site, which is very sensitive to any increase in height and change of roofscape. The term 'landmark' (as per the current plan) correctly implies that increased height will be the exception to the rule. The representor does not support the proposed replacement term 'development' as this does not have the same effect. There potentially serious harmful impact of the policy wording on the protection of the World Heritage Site's Outstanding Universal Value.

Changes to paragraph 3.150 are needed to appropriately address the high importance and numerous ways in which the management of height is important to the appropriate conservation of the World Heritage Site, and other heritage assets.

### **Env 38 - Shopfronts**

Southside Community Council (0781)

Inappropriate shopfront alterations can have a negative impact in all areas.

Edinburgh World Heritage (0339)

Edinburgh World Heritage's Conservation Funding Programme which can (in advice and financial terms) support the conservation, repair and selective restoration of historic shop fronts.

### **New proposed policy: Design standard uplift**

Suzanne McIntosh (0409)

draft City Plan policies do not go far enough in requiring 'lifting' the standard of design.

### **New proposed policy: Aircraft Noise**

Edinburgh Airport Noise Advisory Board (0691)

In line with World Health Organisation "ENVIRONMENTAL NOISE GUIDELINES for the European Region", the Edinburgh Airport Noise Advisory Board (EANAB) consider that residential development should not be supported within areas falling within the 45 dB Lden contour associated with Edinburgh airport. This includes the majority of the proposed

developmental areas between Edinburgh Airport and the A8 corridor. Development in such locations which would have detrimental impact on health and amenity. Using noise insulation within any new housing does not ensure that people can use their private/communal outdoor spaces safely.

### **General comment on all environment policies**

#### Tarmac (0244)

The first statement made in the first sentence of many Env policies is incorrect as it states planning permission will be granted if proposals comply however proposals will likely need to comply with a number of policies before it is granted. As proposed this would create confusion and risk of challenge.

The Environmental Policies are restrictive and inflexible with a general presumption against any development that is not specifically identified in the Plan. This provides a barrier to any strategy, whether it be brownfield or greenfield, and does not allow any flexibility on the urban edge.

Many policies are overly complex, detailed and negative. Requirements in relation to density and open space are too prescriptive. They duplicate information within the Edinburgh Design Guidance and could be removed to aid clarity and conciseness.

### **Modifications sought by those submitting representations:**

#### **Env 1 - Design Quality and Context**

#### Wright PDL (0078), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

The requirement to reflect the characteristics of the surrounding area should be relaxed and/or the density aspirations of the Proposed Plan should be relaxed.

#### Stirling Developments Limited (0303)

It should be clarified if this policy takes precedence over Env 26 (Housing Density)

#### Peter Allen (0336)

Define what Council means by "a vibrant and successful place" and in whose opinion as well as how will this be measured?

#### Homes for Scotland (0404)

Policy needs to be updated to account for a potential conflict with the density requirements of this Plan, particularly in suburban/urban edge areas, given that Env 1 requires proposals to draw upon positive characteristics of an existing area.

#### Living Streets Edinburgh Group (0486)

Modify policy to read as follows:

*"Planning permission will be supported by this policy where it is demonstrated that the proposal will create or contribute towards a vibrant, successful place including adherence to and delivery of the transport hierarchy in Scottish Planning Policy and the National Transport Strategy. Design should be based on an overall design concept that draws upon positive characteristics of the surrounding area. Planning permission will not be granted for poor quality or inappropriate design or for proposals that would be damaging to the character or appearance of the area around it, particularly where this has a special importance or for proposals which do not contribute to delivery of the Transport Hierarchy."*

Edinburgh World Heritage (0339)

Amend the policy wording to read as follows:

*"...overall design concept developed from an understanding of and complementary to positive characteristics and values of the surrounding area...where this has special importance such as the Old and New Towns of Edinburgh World Heritage site and sites and settings of other heritage assets."*

**Env 2 - Co-ordinated Development**

Archie Clark (0003)

Developers should be required to submit adequate plans for development of land in their ownership in the vicinity of the proposal with their first submission.

The Royal London Mutual Insurance Society Ltd (0149)

Remove provision for compulsory purchase at paragraph 3.86. Delete sentence "In some cases, it may be necessary for the Council to use its powers of compulsory purchase to assemble a site for development and enable a satisfactory outcome to be achieved."

Wright PDL (0078), Homes for Scotland (0404), Stirling Developments Limited (0303), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

It is indicated the extent to which Briefs are required under this policy is excessive and Briefs should be focused on large scale strategic sites.

The policy should make clear it is essential that developers and landowners are involved in the creation of design briefs.

There also needs to be a willingness to work with the grain of existing land ownerships as much as possible to avoid complications and delay.

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350)

Delete the proposed City Plan policy wording and use the LDP 2016 policy wording for Env 2.

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)



Revert to the adopted Policy Des 2 (Co-ordinated Development) which is positively worded and overall, more proportionate

New Town & Broughton Community Council (0254).

This policy should be amended to not just 'encourage' but 'require' conformity by rewording to:

*"The Council requires a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of development frameworks, master plans, Development Briefs or Place Briefs to identify the full design potential for creating successful places."*

Cockburn Association (0777)

Amend paragraph 3.86 to read:

*3.86 The Council requires a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of development frameworks, master plans, Development Briefs or Place Briefs to identify the full design potential for creating successful places. Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces. In some cases, it may be necessary for the Council to use its powers of compulsory purchase to assemble a site for development and enable a satisfactory outcome to be achieved.*

Juniper Green & Baberton Mains Community Council (0306)

This policy should be amended to state that it takes into consideration current developments in process and previously approved developments yet to be commenced. Only by incorporating all of these can a true and full picture be formed.

Edinburgh Dog and Cat Home (0310)

Amend Policy Env 2 (Co-ordinated Development) (page 101) to:

*"Planning permission will not be granted for development which would compromise:  
(a) the effective development of adjacent land, or  
(b) the comprehensive development and regeneration of a wider area (i) provided for in a master plan, strategy, Supplementary Guidance, development principles, Site Brief or Place Brief approved by the Council, or (ii) in advance of approval of any such document."*

Melford Developments Ltd (0308)

The policy wording seeks to prevent development which "may" compromise comprehensive development. This is considered unclear and an unreasonably high test. Use of the word "would" is more appropriate. Amend Policy Env 2 (Co-ordinated Development) (page 101) to:

*"Planning permission will not be granted for development which would compromise:  
(a) the effective development of adjacent land, or*

*(b) the comprehensive development and regeneration of a wider area (i) provided for in a master plan, strategy, Supplementary Guidance, development principles, Site Brief or Place Brief approved by the Council, or (ii) in advance of approval of any such document."*

LPBZ Commercial Ltd (0391)

"Effective development" must be defined.

Overall the whole policy requires to be reworded to be more precise and less restrictive.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Amend policy to read as follows (new additions underlined):

*Planning permission will only be granted for development which can demonstrate that:*

- a. It does not compromise the effective development of adjacent land, or*
- b. It accords with the comprehensive development... ‘*

Forth Ports Limited (0496)

Page 101, paragraph 3.86

Delete the last sentence of the paragraph which reads, "*Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces. In some cases, it may be necessary for the Council to use its powers of compulsory purchase to assemble a site for development and enable a satisfactory outcome to be achieved.*"

Remove provision for Compulsory Purchase at Policy HOU1 (para 3.176) and in Section 2 – Strategy

Page 28, 2.103 - delete sentence 4 which reads, "...The Council has also acknowledged that use of compulsory purchase powers to facilitate development may be needed."

Page 29, 2.110 - delete the following text from the second sentence, "... and the use of compulsory purchase powers where necessary."

Page 121, paragraph 3.176 - delete

Page 121, paragraph 3.176

Delete the last sentence of the paragraph which reads, "*On sites in private ownership the Council will, where necessary, intervene to ensure that land comes forward utilising compulsory purchase powers if required.*"

Hallam Land Management (0615)

- Add another clause after (a) 'the restoration and development of vacant, derelict or brownfield land,' to ensure that vacant or derelict land is considered in locations where development is likely to be promoted.
- Add another clause after (a) 'the effective and productive use of available infrastructure

and its capacity,' to ensure that existing infrastructure is not compromised by uncoordinated development.

Cockburn Association (0777)

Amend supporting text to read as follows:

*“3.86 The Council requires a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of development frameworks, master plans, Development Briefs or Place Briefs to identify the full design potential for creating successful places. Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces. In some cases, it may be necessary for the Council to use its powers of compulsory purchase to assemble a site for development and enable a satisfactory outcome to be achieved.”*

**Env 3 – Development Design – Incorporating and Enhancing Existing and Potential Features**

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

The policy text (Page 101) should be amended as follows:

*“Planning permission will be granted for development where it is demonstrated that existing characteristics and features worthy of retention on the site have been identified, incorporated, enhanced and linked to through its design”.*

NatureScot (0528)

Recommend that the requirement that permission will be granted where “it is demonstrated that existing characteristics and features worthy of retention on the site...” is amended to “it is demonstrated through assessment that existing characteristics and features worthy of retention on the site...” so as to make a clearer link to a requirement that identification, incorporation, enhancement and linking to through design should be supported by assessment would help with this ambiguity.

National Grid (0805)

To ensure that Design Policy is consistent with national policy we would request the inclusion of a policy strand along the lines of the following is incorporated into Policy Env3 (or alternative): *“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”*

Edinburgh World Heritage (0339)

3.88 should be amended to more explicitly refer to the historic environment as follows:

*“...features including existing/historic buildings and other built structures, monuments, historic features, spaces and public realm materials, archaeology, trees...”*

These changes are needed to clearly reflect the importance and contribution of the historic environment to Edinburgh, and the special interest of some of its key features.

The following text should be added to 3.87 or introduced as a new paragraph:

*“To address the circumstances that a site does not have the opportunity for a Place Brief to be produced, the council will agree a standard methodology for taking those sites through the pre-application process to ensure consistency and continuity in the supporting information required and assessment criteria.”*

This change is needed as there are some gaps in relation to when a Place Brief is not produced as it is suggested the above wording would address this.

#### **Env 4 - Development Design – Impact on Setting**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

It is indicated that this policy should allow more flexibility for proposals to make their own judgement on a site-by-site basis.

This policy should be modified to make it clear which design policies will carry most weight: is it this policy's requirement for appropriate height, form, scale, proportions, space between buildings, or is the council's blanket high-density requirement?

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

Seek an amendment (page 102), as set out below.

*“Planning permission will be granted for development where it is demonstrated that it will not have an unacceptably negative impact on its surroundings, including the quality of character of the wider townscape and landscape, green blue networks, and impact on existing views, having regard to:*

- a. height, form and roofscape pattern*
- b. scale and proportions, including the spaces between buildings*
- c. position of buildings and other features on and around the site*
- d. materials and detailing*

*3.90. Where the surrounding development is fragmented or of poor quality, development proposals should, where possible and appropriate, help repair the urban fabric, establish model forms of development and generate coherence and distinctiveness – a sense of place. The siting and design of development should also be guided by views within the wider landscape and an understanding of local landscape character, including important topographical features, for example prominent ridges, valleys and patterns of vegetation”.*

Tarmac (0244), Hallam Land Management (0615)

Proposals also need to be assessed on a case-by-case basis.

- Alter wording of policy to “Planning permission will be supported by this policy...” as planning permission will not necessarily be granted if proposals comply with Env 4 as implied by the present wording so rewording is needed to avoid confusion or challenge.
- Alter wording of policy to “...it will not have a detrimental impact on its surroundings...”

Elgin Haymarket Limited (0292)

Ask that this policy states that: *“Impact on setting, and subsequent density, should be guided by Townscape and Visual Impact Assessment”.*

Stirling Developments Limited (0303)

It is indicated that the policy should be amended provide more flexibility and allow for site-by-site basis of the considerations, particularly in terms of green blue infrastructure which can be difficult to deliver on smaller and brownfield sites.

It should be clarified whether this policy takes priority over Env 26 (Housing Density).

Melford Developments Ltd (0308)

Clearer guidance is required in relation to impact on surroundings, character of the wider townscape and cross reference to the Edinburgh Design Guidance.

AREAA (0358)

Reword opening sentence of Policy ENV 4 (P102) to read “Planning permission will be granted for development where it is demonstrated that it will not result in an unacceptable adverse impact and, where possible, will have a positive impact on its surroundings...”

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The change in wording below seeks to require an applicant to demonstrate through assessments that there are no significant adverse impacts. Importantly, this aligns the assessment to that endorsed through the methodologies adopted in terms of environmental impact assessments, achieves a much greater control over development and allows established methodologies to be adopted. It also allows both the Council and an applicant to refer to an established body of case law about significant adverse impacts relating to townscape and landscape character. This case law has been set by the requirement in SESplan Policy 7 a. to demonstrate that greenbelt housing land releases need to be in accord with local townscape and landscape character.

Amend policy to read as follows:

*Planning permission will not be granted for development where it is demonstrated that it will have a significant adverse impact on its surroundings, including the quality of character of the wider townscape and landscape, green blue networks, and impact on existing views, having regard to:*

- a. height, form and roofscape pattern*
- b. scale and proportions, including the spaces between buildings*
- c. position of buildings and other features on and around the site*

*d. materials and detailing*

Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

Policy Env 4 / Paragraph 3.90 should recognise – in line with Paragraph 3.142 – that increasing density and building heights can also enhance an area's character and lead to better placemaking, particularly where there is limited historic character and where visual focal points may enhance otherwise featureless or fragmented townscapes.

Edinburgh Word Heritage (0339)

Policy phrasing needs to be amended as follows:

*“...will have a positive impact on its surroundings and reinforce and contribute to existing positive characteristics – including the quality and character of the wider townscape and landscape, the historic environment and values, green blue networks...”*

This change is needed to protect and enhance the Outstanding Universal Value of the World Heritage sites and the many benefits this brings. Also to clarify that development not only needs to have a positive impact (which can be loosely interpreted), but should reinforce what is positive about its context specifically.

**Env 5 Alterations, Extensions and Domestic Outbuildings**

Archie Clark (0003)

Clarity is needed on how monitoring and measurement will take place in relation to the supporting paragraph requirement that “...all proposals should seek to achieve a net enhancement to the City's green and blue network through sustainable use of gardens and roofscapes.”

Correct the incomplete line that reads “For extensions and outbuildings, it is additionally required that proposals:....”

Juniper Green & Baberton Mains Community Council (0306)

Section 3.90 d. is incomplete, it reads “d. For extensions and outbuildings, it is additionally required that proposals:”

It is also indicated that details should be provided on how green and blue infrastructure requirements will be monitored and measured.

Suzie Ross (0440)

It is indicated that the policy needs to introduce measurable requirements against which to determine planning applications. This is especially needed in relation to issues such as amenity, flooding alleviation, biodiversity and climate change where precise percentages can be developed should be clearly articulated in policy.

Scottish Wildlife Trust Lothian group (0560)

Modify the policy to make clear enhancements to green/blue infrastructure including trees, biodiverse vegetation and habitat, should offer the distinction that these enhancements should offer ecological coherence such as that achieved through the use of native species.

Cockburn Association (0777)

This policy should include an explicit indication against the development of front gardens for private car parking on the grounds that it damages character and affects streetscape.

Edinburgh World Heritage (0339)

3.91 should be amended to read:

*“...a proposal on the appearance and character of the existing building and streetscape generally must be protect and.. enhance the character and streetscape in historic areas and there should be no...”*

3.92 should be amended to read:

*“Where it is not detrimental to the character of a historic area, roofscapes should...”*

We advise that 3.91 be amended to read:

*“...of existing properties across the City, but it should not be at the expense of losing existing garden and green spaces at ground level across the city.”*

These changes are needed to appropriately conserve Edinburgh’s Outstanding Universal value as a World Heritage Site, including its outstanding existing historic green spaces.

**Env 25 - Layout Design**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

This policy should make clear which policy areas will the planning officer give precedence to when determining a planning application.

It is indicated that the policy should be amended to ensure the design approaches of the respective planning and roads departments are aligned.

Mark Ockendon (0419)

Replace point (c) to read:

*"the layout will encourage an integrated transport approach including walking, wheeling, cycling, public transport, taxis, and car. Emissions reductions will be supported through provision of electric vehicle charging to encourage the shift away from fossil-fuel based modes of transport."*

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Modify the policy to read as follows:

*Proposals will be supported by this policy (so far as applicable to the scale and nature of development proposed) where:*

*a. a comprehensive and integrated approach has been taken to the retention, design, layout and orientation of buildings, streets, footpaths, cycle paths, public and private open spaces, services, plant equipment, and green/blue networks (including SUDS features, landscape and tree planting, biodiversity connectivity and habitat),*

*b. new streets and active travel routes within developments are direct and connected with adjoining networks where possible to ensure ease of access to local centres and public transport,*

*c. the layout will encourage walking/wheeling and cycling to reduce emissions and address the climate emergency, cater for the requirements of public transport if required and in corporate design features which encourage slower driving, actively reduce the space and priority given over to private vehicles, and minimise potential conflict between pedestrians, cyclists and motorised traffic,*

*d. car and cycle parking areas and pedestrian and cycle paths are overlooked by surrounding properties,*

*e. safe and convenient access and movement in and around the development will be promoted, having regard especially to the needs of people with limited mobility or special needs,*

*f. attractive public open spaces, focal points, SUDS features biodiversity habitat, play and education opportunities are provided and connected with the appropriate features and green blue network in the surrounding area, and*

*g. it is designed to create and retain public views of the City as defined in Edinburgh Design Guidance as well as through the development and from it.*

Living Streets Edinburgh Group (0486)

Modify the policy to read as follows:

*Proposals will be supported by this policy (so far as applicable to the scale and nature of development proposed) where:*

*" Insert a new a. they adhere to and contribute to delivery of the transport hierarchy in Scottish Planning Policy and the National Transport Strategy*

*b. new streets have pedestrian priority and pedestrian and cycle routes within developments are direct and connected with adjoining networks wherever possible to ensure ease of access to local centres and public transport,*



*c. the layout will deliver and prioritise walking/wheeling and cycling to reduce emissions and address the climate emergency, cater for the requirements of public transport if required and incorporate design features which only accommodate driving as a last resort, actively remove the space and priority given over to private vehicles, and remove potential conflict between pedestrians, cyclists and motorised traffic,*

*e. safe and convenient access and movement in and around the development will be required, having regard especially to the needs of people with limited mobility or special needs*

*3.141 The layout of development must enhance community safety and urban vitality and be based on direct and convenient connections on foot/wheel and by cycle. Where new road space is required as an integral and necessary part of new development, layouts must prioritise walking/wheeling and cycling, and not accommodate greater car use or cause or add to congestion in the surrounding area."*

#### Corstorphine Community Council (0799)

This proposal should be amended to include reference to 20 minute neighbourhoods.

Item d's parking areas and cycle/footpath connections should be "well lit", as well as being overlooked by surrounding properties.

#### Edinburgh World Heritage (0339)

Add a new bullet at second-to-last position to read:

*"The layout of the site is not detrimental to the existing urban design of an historic area. It should reinforce and enhance, where possible, the existing street pattern and hierarchies. The balance and hierarchy of spaces within the site should complement and enhance the character of a conservation area."*

This is needed to appropriately protect and enhance the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site. The layout of any historic area is a major feature of its character. This should be retained protected and where possible new development should reinforce the pattern and hierarchy of the streetscape.

### **Env 27 – Public Realm, New Planting and Landscape Design**

#### Archie Clark (0003)

This should include reference to the increasing number of untidy and excessively high telecoms masts, sometimes duplicating masts in close proximity (e.g. at Lanark Road near the canal). Reference should be made to 'PAN 62 Radio Telecommunications' and CEC's 'Communications Infrastructure 2018'. Masts that do not have adequate regard to the environment can ruin the appearance of a place. Equipment must be designed for the location and provide a unified appearance instead of the prevailing miscellany of different boxes provided by different companies. All redundant equipment should be removed. Where possible, equipment should not intrude on to footways. Refer also to Inf21 Telecommunications.

The bullets contain a statement: “a tree canopy coverage of appropriate species shall be achieved in line with Council guidance\*”. The enhancement and explanation implied by this asterisk is not provided in the following text however.

Juniper Green & Baberton Mains Community Council (0306)

Criterion b) should address the increasing number of telecoms masts, sometimes duplicating masts in close proximity, as masts that do not have adequate regard to the environment can ruin the appearance of a place.

It should be stated that equipment must be designed for the location and provide a unified appearance instead of the prevailing miscellany of different boxes provided by different companies. All redundant equipment should be removed. Where possible, equipment should not intrude on to footways.

Reference should be made to PAN 62 Radio Telecommunications and CEC’s Communications Infrastructure 2018.

Section 3.142 c. contains a statement, “*a tree canopy coverage of appropriate species shall be achieved in line with Council guidance\**”. However the enhancement and explanation implied by this asterisk is not provided in the text following.

Edinburgh Airport Limited (0761)

Criterion C should be amended to be worded as follows:

*“c. where appropriate a tree canopy coverage of appropriate species shall be achieved in line with Council guidance\*, as well as hedge, shrub and wildflower planting to provide a setting for buildings, boundaries and roadsides and create a robust landscape structure,”*

Edinburgh World Heritage (0339)

Bullet one revised to read:

“...interest or importance – conserving and where possible enhancing positive and historic integrity, authenticity, values and character.”

Bullet two revised to read:

*“...over different phases of a development. New poles, signage, road markings, guard rails, waste bins and other street furniture should be kept to a minimum where appropriate to avoid clutter in the streetscape, particularly in conservation areas.”*

Amend bullet three to read:

*“...and create a robust landscape structure. In historic areas the historic character should be understood, conserved and enhanced in the new planting and landscaping design.”*

Add a new bullet between current bullets two and three to read:

*“New landscaping with conservation areas reinforce the character of the area and is an opportunity to reflect the local layout, and typical species of planting and enhance the historic built environment.”*

Add a new bullet to read:

*“Streetlighting, architectural and landscape lighting should be designed and specified to complement the new development and surrounding area. In historic areas it should reflect the historic character of the area, enhancing and interpreting the built heritage in an appropriate manner according to the Streetlighting Strategy.”*

The above changes are needed to appropriately protect and enhance the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site. They are also needed to make clear what ‘appropriate’ means for Edinburgh’s many historic (including undesignated) historic spaces – including for example response to heritage interest of local areas, the importance of lighting design and avoiding streetscape ‘clutter’

The additional reference to public art is welcomed (where its addition is sensitive to the historic values – see point above). It is noted there is positive opportunity to better represent Edinburgh’s diverse history more inclusively through such public art.

## **Env 28 – Urban Edge Development**

Tarmac (0244), Mr T Klan (0307), Hallam Land Management (0615)

Delete policy as paragraph 3.14 suggests the policy is to protect green belt boundaries and objectives however Policy Env 18 provides this protection.

Alternatively re-word to give positive encouragement where development contributes to sustainability objectives *or* reword to make clear what sites would be considered as ‘urban edge’. It would also need to be clarified when a development proposal would qualify as being in this zone. For example, would a site need to be wholly within the ‘urban area’ but adjoining the ‘Countryside’ or ‘Green Belt’ boundary? Or would it just need to be in close proximity? Or, does it mean sites that sit just outside but adjoining the ‘urban area’?

The Association for the Protection of Rural Scotland (0334)

Amend policy to make an addition: Cumulative adverse landscape effects caused by cumulative impacts of pylons; communication masts, etc which must be avoided. This should be cognisant of cumulative impacts of wind turbines which can arise even over long distances given the ever increasing height of turbines.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Amend policy wording to read as follows:

*Planning permission will only be granted for development on sites at the green belt boundary where it:*

- a. maintains the landscape setting and character of the city*
- b. promotes access to the surrounding countryside if possible*
- c. includes landscape and environmental improvements that help establish clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads*

Crosswind Developments Ltd (0184)

It is indicated that the Crosswind site (H61) should not be considered urban edge development as indicated on the proposals map.

**Env 29 - Waterside Development**

LPBZ Commercial Ltd (0391)

This policy refer to specific bodies of water where recreational uses would be appropriate and well used.

NatureScot (0528)

Policy Env 29 part c) (page 115) should be amended as follows: *"design in climate change resilience and adaptation, including through maintaining and enhancing the green blue network, particularly the water environment and its nature conversation and landscape interest (inclusive of its margins and river valley) including incorporating an adaptation buffer zone\* along waterfronts and edges"*

Leith Central Community Council (0614)

Better define recreational use and avoid risk of potential harm to natural habitats arising from it.

Edinburgh Airport Limited (0761)

Amend policy wording to read as follows:

*"Development on sites on the coastal edge or adjoining a watercourse, including the union canal, (except where these are within the boundary of the Airport) will only be supported where the proposals:*

- a. provide an attractive frontage to the adjacent water's edge and have had regard for character of the existing local area,*
- b. where appropriate maintain, provide or improve public access to and along the water's edge,*
- c. maintain and enhance the green blue network, particularly the water environment and its nature conservation and landscape interest (inclusive of its margins and river valley) including incorporating a buffer zone\* along the water's edge,*
- d. promote the recreational use of the water."*

Water of Leith Conservation Trust (0392)

It is indicated that it should be made more apparent where one can find the policy requirement for a 20m buffer along the Water of Leith.

Crown Estate Scotland (The Forth District Salmon Fishery Board) (0346)

Within our delegated powers vested by Crown Estate Scotland we wish to seek assurances that suitable access to rivers i.e. The Niddry Burn and Gogar Burn with salmon fishing interests are considered and duly receive recognition as part of the current Local Development Plan process.

Crosswind Developments Ltd (0184)

Modify the supporting text of this policy to read:

“\*The width of the buffer zone noted in criterion c) should be proportionate to the nature and size of the adjacent water environment. Further details are set out in the Green Blue network section of the Edinburgh Design Guidance. Buffer zones (as set out in Part 4, Table 1, Environment Proposals) should provide space for habitat creation as well as allowing fluvial and coastal processes to occur, including accounting for climate change and erosion. This buffer zone should be clear of new or existing development unless needed for food defence or of historic merit”.

**Env 30 – Building heights**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767),

It is indicated this policy needs to be amended to aligned with the density requirements and/or clarity should be provided on which policy takes precedence in instances where the two policies contradict each other.

Crosswind Developments Ltd (0184)

This amendment (page 115) is set out below:

*“Development which rises above the building height prevailing generally in the surrounding area will only be supported by this policy where each of the following criteria are met:*

- a. development should not adversely impact the skyline and surrounding townscape and should be justified by the proposed use;...”*

Stirling Developments Limited (0303)

This policy should make clear heights should be cognisant of existing structures not notional density aspirations given this policy could come into conflict with policy Env 26 (Housing Density) so it needs to be made clear which policy takes priority.

Melford Developments Ltd (0308)

Relax policy wording by amending wording to use phrases such as 'where appropriate' or 'where justified'.

Pawel Stankiewicz (0445)

1) In the lead section of Env 30 Building Heights Representation point a should be *"a development is to be created that is not significantly detrimental to the skyline and surrounding townscape and is justified by the proposed use"* since higher buildings make the possible high density of dwellings and some open spaces as recognised elsewhere in the Plan.

2) Point b should be deleted as it is too vague, hence discretionary. Most of the landmarks would get no permission with such policy.

3) There is no great value in roofscape reflecting valleys and hills, or making an illusion of them, in the areas otherwise not worthy of protecting so paragraph 3.150 on page 116 should be:

*"In addition, the height of new buildings may need to be suppressed where necessary so that the city's topography and valley features continue to be reflected in roofscape of the World Heritage Sites as well as Conservation Areas and Listed Buildings."*

4) Paragraph 3.152 on page 116 should be deleted since vague and discretionary regulations should be very limited, with no ammunition given to those fundamentally opposed to development in their area and architects need to be given more freedom as this will create variable but more interesting results.

Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

There should be additional acknowledgement of the varying sensitivities of different parts of the city; greater recognition that building heights can also enhance an area's character and lead to better placemaking, particularly where there is limited historic character and where visual focal points may enhance otherwise featureless townscapes (as accepted at paragraph 3.142); and, distinction made between wholly alien standalone buildings and developments which increase building heights in the area in a coordinated, considered and justifiable way to deliver a distinctive, cohesive sense of place (as accepted at paragraph 3.90).

Aviva Life and Pensions UK Limited (0598)

Allow greater heights where appropriate and also introduce a reference to the Haymarket area within the scope of the policy where higher density, and taller development, and in areas outwith key heritage designations, will be considered acceptable within the city centre.

Leith Central Community Council (0614)

The policy should explicitly require new developments to match prevailing/neighbouring height/density without recourse to "tricks" like set back top floors.

The concept of a development which enhances the skyline is too vague and needs more material conditions.

The policy needs more emphasis views from directly affected neighbours or local residents.

It should be demonstrated that developments which rise above the prevailing building height do not increase local air pollution by impeding local air flow.

Excess height should be matched by commensurate increases in quality public green amenity space, new vistas and increases in social infrastructure (for example libraries and retail).

#### Edinburgh World Heritage (0339)

Amend policy wording point 'a' to read:

*"A landmark is to be created that enhances the skyline and surrounding townscape and is justified by the proposed use."*

3.150 should be amended to read:

*"...so that the city's topography, characteristic urban design of 'primary' and 'secondary' streets, historic landmarks and valley features continue to be reflected in roofscapes. This policy will play a highly important role in protecting the World Heritage Sites, Conservation Areas, Listed Buildings and the setting of all heritage assets. "*

#### **Env 38 - Shopfronts**

##### Southside Community Council (0781)

This policy should be re-worded from the vague "particular care will be taken with ...." to - for example - "inappropriate shopfront alterations will not be approved in ...".

##### Edinburgh World Heritage (0339)

No modification stated but it is indicated that, if appropriate, reference could be made to Edinburgh World Heritage's Conservation Funding Programme which can (in advice and financial terms) support the conservation, repair and selective restoration of historic shop fronts.

#### **New proposed policy: Design standard uplift**

##### Suzanne McIntosh (0409)

It is indicated that a new policy should be created requiring a percentage of the site to be 'lifted' in terms of design for sites allocated as the draft City Plan policies do not go far enough in this regard.

#### **New proposed policy: Aircraft Noise**

### Edinburgh Airport Noise Advisory Board (0691)

Create a new policy relating to aircraft noise, which prevents new residential development that would experience excessive noise levels arising from aircraft. This policy should be based on a modified version of that in Renfrewshire Council's Local Development Plan (2014). The Renfrewshire policy reads:

*"Noise Applications for residential development under or in the vicinity of aircraft flight paths, where noise levels in excess of 57dB (year 2011 Actual Annual LAEQ contours) are experienced (see figure 2), will be refused due to the inability to create an appropriate level of residential amenity and to safeguard the future operation of Glasgow Airport. These noise levels will be reviewed periodically, in line with the Local Development Plan and will take into consideration the most up to date published noise contours".*

City Plan should have a similarly worded noise policy (with a lower noise threshold corresponding to WHO guidelines) to prevent development in locations which would have detrimental impacts on health and amenity.

### **General comment on all environment policies**

#### Tarmac (0244)

Where policies use the introductory phrase of "*Planning permission will be granted for development where...*" then this should be reworded to "*Planning permission will be supported by this policy where...*" or "*Development will only be permitted where...*".

It is also indicated Env policies should overall be made less detailed and more flexible.

### **Summary of responses (including reasons) by planning authority:**

#### **Env 1 – Design Quality and Context**

Wright PDL (0078), Stirling Developments Limited (0303), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Homes for Scotland (0404)

The Council does not consider there to be a conflict between this policy and density aspirations in the Plan/ Policy 26. Drawing upon positive characteristics of the surrounding area whilst achieving appropriate density are not mutually incompatible. There is addressed further in Issue 12: Density.

It is for the decision maker to determine which policies are applicable to a given proposal and the balance of these in the determination of an application. It is not the role of an LDP to set an order of precedence since this may vary depending on the material circumstances of the case. **No modification proposed.**

#### Peter Allen (0336)

The Council considers the term "a vibrant and successful place" to be sufficiently clear. The Council's Edinburgh Design Guidance provide further information on successful placemaking. **No modification proposed.**



### Living Streets Edinburgh Group (0486)

The Council considers that this policy's requirement for successful placemaking adequately addresses this when read in conjunction with other policies in this Plan and the Edinburgh Design Guidance, particularly Section 4 'Designing Streets: Edinburgh Street Design Guidance. **No modification proposed.**

### Edinburgh World Heritage (0339)

This policy should be read in conjunction with other policies in the Plan, which includes Env 9 which relates to World Heritage Sites. As such it is not necessary to refer to the matters raised in an additional capacity in Env 1. **No modification proposed.**

The following representations support the policy as proposed:

Liberton & District Community Council (0084), Grange/Prestonfield Community Council (0192), Scottish Wildlife Trust Lothian group (0560), Leith Harbour and Newhaven Community Council (0776), Cockburn Association (0777)

## **Env 2 – Co-ordinated Development**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

A policy cannot set out every type of application (consented or otherwise), or every existing building or development type which may form a context for new development. It may at times be appropriate to consider unbuilt development, however, the scale of such development may not be materially significant. It is appropriate for the decision maker to judge what scale and types of proposal are relevant. It is noted that this policy is largely similar to that in the LDP 2016 and there has not been a need to include further details on application/development types in this time. **No modification proposed**

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Crosswind Developments Ltd (0184), Taylor Wimpey (0200), Edinburgh Airport Limited (0761), Melford Developments Ltd (0308), Edinburgh Dog and Cat Home (0310), LPBZ Commercial Ltd (0391), CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Wright PDL (0078), Homes for Scotland (0404), Stirling Developments Limited (0303), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

Policies cannot set out every circumstance in which they will apply given the wide range of different sites and types of proposal that may come forward. It is for the decision maker to consider what policies to apply and what weight to give them. The Council has identified where it considers a master plan, strategy, guidance or brief may be required for an area. However, sites not previously considered may come forward which due to factors such as their complexity, scale or location, require coordinated planning.

The requirements identified in the Plan are good placemaking practice for many larger developments including those in multiple ownerships. As such the Council considers it unlikely that criterion b) will cause great levels of uncertainty or disproportionate delay. The Council agrees that it will often be large scale sites where such coordinated planning

is necessary, however, it is not agreed these are necessarily the *only* situations where this may apply.

Multiple landownership can be a challenge to delivering successful places. Policy should not prevent development happening but should require in certain cases, that coordination of development be part of the process.

Individual applications or statutory pre-applications may not be able to undertake full appraisal of a site's context. For example, issues around shared infrastructure or coordination of important non-residential uses may not be addressed in isolation. Where community engagement is part of forward planning, the Council does not accept this has to necessarily serve as an exercise in unreasonable inflation of expectations. If the process is undertaken correctly and from an early stage in proceedings it can provide clarity for all.

The Council is progressing Place Briefs (or equivalent) for a number of sites and the Place Policy Development Principles set out the basis for many others. Place Briefs or Development Frameworks exist already for some sites already, the Council can programme work in line with the likely phasing of sites and this will be kept under review.

The Council agrees it is beneficial for all parties if landowners and prospective developers are involved in the forward planning process. This is ongoing for a number of major sites and will continue. **No modification proposed**

#### LPBZ Commercial Ltd (0391)

The term 'effective development of adjacent land' is considered sufficient to allow a judgement to be made about whether this policy would apply in relation to criterion a). It is not possible to be specific beyond this because there may be a variety of reasons why a proposal has this effect including incompatible land uses or excessive scale.

Criterion b) and the term comprehensive redevelopment are considered sufficiently clear in policy terms. It is not possible example every possible circumstance. The supporting text covers this further though not exhaustively but is clear that piecemeal development is less likely to create well defined and cohesive networks of streets and spaces, exemplifying the type of factor needing consideration in responding to the policy. **No modification proposed**

#### CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Individual proposals will be appropriate in many cases and these can be addressed by other policies including Env 3. The policy would not prevent applicants amending proposals post-submission to respond to emerging information, so does not inherently conflict with criteria a and b. The Council would consider the material circumstances of any conflict appropriately on a case-by-case basis. **No modification proposed.**

#### Hallam Land Management (0615)

The first suggested new criteria is considered to be covered by proposed criterion a. since it would fall within the overall definition of 'adjacent land'.

The second is considered adequately addressed by criterion b) given that the comprehensive redevelopment regeneration of the wider area is already inclusive of infrastructure as a consideration. Policy Inf 3: Infrastructure Delivery and Developer Contributions also applies and ensures development must be accompanied by requisite infrastructure where necessary. **No modification proposed.**

Melford Developments Ltd (0308), Edinburgh Dog and Cat Home (0310), LPBZ Commercial Ltd (0391), Forth Ports Limited (0496), The Royal London Mutual Insurance Society Ltd (0149)

The Council considers that the few and brief references in the Plan to potential use of CPO powers if necessary is appropriate, given they are legislative provisions for issues of public interest and might be required to assist with coordinated delivery.

Sentence in supporting paragraph 3.86 reading: "*Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces*" should be retained. This sets out the logic for the policy and an example of why it might be applied. **No modification proposed.**

Cockburn Association (0777), New Town & Broughton Community Council (0254)

The Council considers that the wording as proposed reflects that a comprehensive approach to development will be supported but that development frameworks, master plans, Development Briefs or Place Briefs will not always be required. The policy text allows for this. **No modification proposed.**

Edinburgh World Heritage (0339)

The Old and New Towns of Edinburgh World Heritage site and sites and settings of other heritage assets do not need to be cited as examples of special importance as this is already evident and stated elsewhere in para 2.47. The Council considers that the policy wording of drawing upon positive characteristics of the surrounding area sufficiently addresses the need to first understand and identify these characteristics and complement them. **No modification proposed.**

The following representations support the policy as proposed:

Liberton & District Community Council (0084), Grange/Prestonfield Community Council (0192), Elgin Haymarket Limited (0292), Scottish Wildlife Trust Lothian group (0560), Leith Harbour and Newhaven Community Council (0776)

### **Env 3 - Development Design – Incorporating and Enhancing Existing and Potential Features**

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

The Council considers that the Policy read in the round is clear in referencing on and off-site features as needing to be addressed through design in terms of identification, incorporation, enhancement. Incorporation will be expected for on-site features. However aspects such as open space or civic space, important public views or settings of heritage

assets off-site may need consideration of orientation, frontages, scale etc. **No modification proposed.**

#### National Grid (0805)

The Council considers that due diligence by developers requires their understanding of utilities and any protecting designations, as well as providing for servicing the site. **No modification proposed**

#### NatureScot (0528)

No modification proposed, however, should the Reporter be so minded the Council has no issue for the purposes of clarity in a modification stating that 'assessment' is an important, initial part of the process of identifying features of merit. This would then make it easier for decision makers and others involved in reviewing proposals to see how all features on - site and adjacent have been considered and then addressed in the proposal.

#### Edinburgh World Heritage (0339)

The Council does not see a need to add the term 'historic feature' to the Policy wording. The Council does not consider it necessary to explicitly refer to each type of historic feature referred to in the proposed modification to paragraph 3.88.

The Council cannot agree a process with applicants for pre-application engagement which sets out expectations for the Council which are beyond its powers. The Council cannot require pre-application engagement. **No modification proposed.**

The following representations support the policy as proposed:

SEPA (0012), Liberton & District Community Council (0084), Grange/Prestonfield Community Council (0192), Scottish Wildlife Trust Lothian group (0560), RSPB (0648), Leith Harbour and Newhaven Community Council (0776)

### **Env 4 – Development Design – Impact on Setting**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Stirling Developments Limited (0303)

The Council considers this policy is worded to apply to a range of site circumstances. The policy does not state that a certain level or type of green and blue infrastructure has to be delivered in all cases, instead the policy is emphasising the importance of the proposal having a positive effect in respect of its context.

Issues around the compatibility of density with issues of townscape setting and other issues in this policy are addressed further in Issue 12: Density.

It is not for individual policies to set out their weight relative to other policies. This is a matter for the decision maker if they consider there is a level of conflict between different policies. **No modification proposed.**

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761), Tarmac (0244), AREAA (0358), CALA Management Ltd (0465), Hallam Land Management (0599) (0615), Miller Homes Limited (0649), Melford Developments Ltd (0308)

Although the threshold of positive impact sets a higher bar for proposals, the Council considers it appropriate for proposals to demonstrate a positive impact given this policy addresses important issues of setting. The emphasis reflects that of the equivalent existing LDP policy Des 4 in this regard and the Council does not consider any material considerations have changed the merit of that approach. The strategy of the Plan has an emphasis on urban redevelopment where such an emphasis is even more important.

Assessing a positive impact is no more subjective than assessing a negative impact and allows for just as much precision and control. A positive impact does not need to set a magnitude of effect as basic judgement is whether the proposal has a net positive effect. It is considered achievable in many instances given the context of the majority of sites expected to come forward in the plan period. There is not considered to be conflict between the spatial strategy and delivering the aims and outcomes of the Plan. These are not just 'maximising the development potential' of land as set out in the representations.

Representations note minimum requirements for environmental, landscape and heritage in terms of assessments in other contexts. City Plan is permitted to have different thresholds of acceptability given it relates to a specific geographic context. NPF 4 CD099 will succeed the Strategic Development Plan CD087 and SPP CD096. However, SPP sets out in paragraph 36 in respect of Placemaking is that 'Planning's purpose is to create better places.'. Draft NPF 4 Policy 6 (c) states that proposals should incorporate the six qualities of a successful places so that the development '...contributes positively to the character of the area...'

Demonstrating a positive impact to a decision maker is in principle the same for any threshold, for example. preservation or enhancement. The issue is not the threshold itself but how well proposals are designed to be respond to setting. **No modification proposed.**

Melford Developments Ltd (0308)

The Council considers the policy text is sufficiently clear in setting the attributes that need to be considered, however, should the Reporter consider the amendment has merit the Council would not have issue with additional reference to the Edinburgh Design Guidance CD047 in the supporting text. **No modification proposed**

Elgin Haymarket Limited (0292)

In some instances a "Townscape and Visual Impact Assessment" will be required to support an application, however this may not be necessary in every case where this policy applies. **No modification proposed.**

Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

The impact of density on townscape and placemaking is addressed in Issue 12: Density. The modification proposed is already in the supporting text for Policy Env 26, which the

Council considers the appropriate place, rather than supporting Policy Env 4. Plan policies require to be read as a whole. **No modification proposed**

Edinburgh Word Heritage (0339)

The Council considers that the existing policy allows for proposals to have a positive impact by reinforcing existing (positive) attributes of an area, without precluding that a positive impact may be achieved in some situations where alternative approaches may be beneficial.

The existing wording is also able to be applied to a historic context so explicitly stating this is unnecessary. **No modification proposed**

The following representations support the policy as proposed:

Liberton & District Community Council (0084), Grange/Prestonfield Community Council (0192), NatureScot (0528), Scottish Wildlife Trust Lothian group (0560), RSPB (0648), Leith Harbour and Newhaven Community Council (0776)

**Env 5 – Alterations, Extensions and Domestic Outbuildings**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Criterion d) ends with a colon so as to lead the reader onto looking at the two further criteria below (e and f).

Applications shall set out their blue green elements of their proposals (such as green roofs) as part of proposals so that these can be assessed as part of the application. The Council accepts that permitted development rights allow for future change for this in some circumstances. However, this is true of many development elements from householder scale to larger schemes. The key matter is the delivery of the green blue elements as part of the overall proposal as it is more likely the infrastructure and benefits of this will remain thereafter than if the measures were not incorporated. **No modification proposed.**

Suzie Ross (0440)

It is considered appropriate that a range of green and blue infrastructure options are available to applicants as different proposal types will be much more suited to different proposal types and design solutions. **No modification proposed.**

Suzie Ross (0440), Scottish Wildlife Trust Lothian group (0560)

The level of detail being sought for measuring policy requirements is more appropriate for guidance than policy. The Council regularly reviews its applicable guidance (including guidance for Householders) to ensure it is fit for purpose for new policies once adopted. **No modification proposed.**

Cockburn Association (0777)

The matter of how and when driveways are permitted is presently addressed as a more detailed guidance applied alongside LDP policy. Permitted development rights also exist

for driveways in some circumstances. The Council is content that these should continue to set the framework for driveways rather than updating LDP policy itself. **No modification proposed.**

Edinburgh Word Heritage (0339)

The Council considers that the wording as proposed allows for heritage to be considered in addition to situations with less direct heritage sensitivity.

The proposed modification to paragraph 3.93 appears to re-iterate the point that is already being made in the final sentence i.e. greenspace is important to retain and enhance even at a small scale given the cumulative impact. **No modification proposed.**

The following representations support the policy as proposed:

Liberton & District Community Council (0084), Grange/Prestonfield Community Council (0192), RSPB (0648)

**Env 25 - Layout Design**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Criterion b clearly states ‘...wherever possible...’ in respect of connecting to adjoining networks, this addresses concerns around what is deliverable for applicants in terms of connecting to neighbouring land.

The Council does not consider changing ‘wherever’ to ‘where’ (as requested) would have a significantly different meaning.

Not all views are equally attractive and as such criterion g is worded to make clear certain views are important to account for in design and layout terms. **No modification proposed.**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

It is not clear where the representations consider this policy misaligns with roads department approaches. The Council considers there is alignment in this respect.

It is not for an LDP to give an order of precedence to different policies. It is for the decision maker to give weight to policies with regard to the circumstances of the proposal. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers the proposed policy accords with the transport hierarchy set out in SPP CD096 and the National Transport Strategy CD110. In particular criterion c) specifically states layouts should prioritise walking/wheeling and cycling. **No modification proposed.**

#### Corstorphine Community Council (0799)

This policy needs to be read with other policies of the plan, including Inf 1 'Access to Community Facilities'; the Council is content the combined effect of this policy and others would deliver the first stated aim of City Plan to encourage 20 minute neighbourhoods. Many of the criteria in Env 25 are important to delivering this by promoting walking, wheeling and cycling.

Issues relating to security are addressed in adopted LDP CD039 policy Des 5 'Development Design Amenity'. The equivalent policy in the Plan is Env 33 'Amenity'. The City Plan version of this policy does not address the points previously covered in criteria c to e of the Adopted Plan policy Des 5 as City Plan policy Env 25 'Layout Design' is the more appropriate place for these criteria. For example, criterion a) of Env 25 details how features should be integrated into the layout of a development in a similar manner to criterion e) of Des 5.

It is not considered necessary to add 'well lit' to criterion d. Criterion e requires the development to be safe. It is for detailed design proposals to include elements of lighting appropriate to the situation. **No modification proposed.**

#### Mark Ockendon (0419)

This policy does not preclude car transport, however the Council considers this policy is appropriate in considering private, car based travel is a lesser priority in the design and layout of developments. This is in line with the principle of reducing car dependency as set out in the six qualities of a successful place promoted by draft NPF4 CD099, with the third quality stating the need to reduce car dependency and promote walking, wheeling and active travel. It also accords with the Sustainable Transport Hierarchy set out in the National Transport Strategy (2020) CD110. More generally it accords with City Plan's strategy of creating 20 minute neighbourhoods, pleasant places and reducing carbon emissions. **No modification proposed.**

#### Edinburgh World Heritage (0339)

The role of this policy is primarily to consider the layout of new development itself, with some specific criteria also concerned with how developments connect to the surrounding area. Other policies, such as Env 3, exist to consider how/if a proposal has incorporated the relevant attributes of a surrounding area. Policy Env 14 is relevant to Conservation Areas. **No modification proposed.**

The following representations support the policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192),  
Stirling Developments Limited (0303)

### **Env 27 – Public Realm, New Planting and Landscape Design**

#### Edinburgh Airport Limited (0761)

Criterion c already provides scope for variable application of tree canopy coverage given the reference to guidance which will set out levels required. No modification proposed. **No**



**modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Council acknowledges the asterisk at the end of the words ‘...Council guidance’ in criterion c is a technical error as there is no corresponding paragraph with asterisk and so this asterisk should be deleted as a minor drafting/technical matter.

Inf 21 addresses issues around telecommunications equipment as such is not considered necessary to be addressed here in Policy Env 27.

Edinburgh World Heritage (0339)

The Council considers the criterion a. requirement for design and materials to be appropriate to the special interest and importance of an area already covers this sufficiently.

The Council considers likewise for criterion b. since there is a ‘catch-all’ reference to ‘other features’ as proposed.

Criterion b) applies to Conservation Areas as well as other areas. It is already set out in Policy Env 14. For this same reason the Council does not consider the new bullet point proposed in the representation between criteria b) and c) is necessary.

The Council will be updating its guidance on criterion c and will be cognisant of historic character this does not need to be stated here.

Env 27 does not make provision for lighting, however it is considered to be one of a range of matters that contributes to the overall quality of a place as required under Env 25.

It is noted that the design of lighting and street furniture should complement the surroundings particularly where it has a special character. However, this is a detailed element of design which is already captured in the Edinburgh Design Guidance CD047 and relevant Conservation area appraisals. **No modification proposed.**

The following representations support the policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192), HUB Residential (0582), Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695), Parabola Edinburgh Limited (0723)

**Env 28 - Urban Edge Development**

Tarmac (0244), Hallam Land Management (0615), Mr T Klan (0307)

This policy continues to provide for unique design and layout considerations for development proposals at the urban edge in the same manner as Policy Des 9 – Urban Edge in the adopted LDP CD039. It is not meant for assessing the principles of development.

City Plan has not deleted the explanation of the objectives of the Green Belt. These are

set out in paragraph 2.58 (page 20) in Part 2.

The Council considers it clear where this proposal applies in spatial terms. It can apply to developments at the boundary either side of it. Further detail is not considered necessary. It is for the decision maker to consider the use and weight of this policy in relation to the scale and nature of proposals.

SPP CD096 paragraph 49 states that ‘... the development plan may designate a green belt around a city or town to support the spatial strategy by:... [inter alia] ... protecting and enhancing the character, landscape setting and identify of the settlement...’ The Council considers the policy accords with this objective. It would completely undermine this objective and a key purpose of the Plan in setting a green belt boundary if the Council then had a policy wording (Env 28) which meant developments failed to protect and enhance the character, landscape setting and identify of the settlement.

The Council agrees that defensibility of the green belt boundary is about selecting the appropriate landscape features to define the boundary but disagrees that other matters are not also important in this regard; even when they are less significant in scale. **No modification proposed.**

The Association for the Protection of Rural Scotland (0334)

The Council considers that criterion already addresses this issue and that cumulative impact can be taken into account as part of this. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Council does not consider that the policy conflicts with SDP CD087 policy 7 or 12. These SDP CD087 policies are not about the detailed design of development or development within Edinburgh’s Urban Area and as such are not relevant. It is further noted that the SDP CD087 policies in question will soon be superseded by that of NPF4 CD099.

Policy Env 28 is about development occurring within the Urban Area of the city at the green belt edge. It is not about the status of the green belt. The policy remains largely unchanged from policy Des 9 Urban Edge Development of the LDP 2016 CD039. **No modification proposed.**

Crosswind Developments Ltd (0184)

Env 28 is noted on the proposals map as being a ‘map wide’ policy. This means it is for the decision maker to determine if it is applicable to an application; not that it necessarily applies to everywhere in the Edinburgh area. There is no need to remove H61 specifically. **No modification proposed.**

The following representations support the policy as proposed:

SEPA (0012), Wright PDL (0078), Grange/Prestonfield Community Council (0192), Stirling Developments Limited (0303), Homes for Scotland (0404)

## Env 29 - Waterside Development

### LPBZ Commercial Ltd (0391)

Promoting the recreational use of water does not *have* to involve water sports or even deep water swimming in water bodies. Criterion d is to encourage the use of the waterside and water's edge for leisure purposes so as to maximise the additional opportunity water bodies present over and above normal civic and greenspaces. **No modification proposed.**

### Leith Central Community Council (0614)

The Council considers it appropriate to keep the term recreational use of water as relatively open in terms of what it may cover given the nature of what could be acceptable and should be encouraged will vary depending on circumstances. This includes, for example, accepting the fact that water sports for example could have a detrimental effect on nature in certain aquatic environs. Given other policies such as Env 21 'Protection of Biodiversity' it is considered that the applicable policies for informing and assessing proposals is an appropriate to ensure suitable development in relation to the water environment. **No modification proposed.**

### NatureScot (0528)

The Council agrees that there are significant challenges faced in respect of flooding and coastal change. As demonstrated by Dynamic Coast CD135 these challenges will likely grow in magnitude in future years. The Council continues to use its range of powers across services to consider and deliver appropriate actions. No modification proposed as the Council considers City Plan's policies support this however should, should the Reporter be so minded the Council has no issue so that instead criterion c is amended to read as follows:

*: "design in climate change resilience and adaptation and ensuring this involves the maintenance and enhancement of the green blue network, particularly the water environment and its nature conversation and landscape interest (inclusive of its margins and river valley) including incorporating an adaptation buffer zone\* along waterfronts and edges"*

The Council proposes this to make it clear in *all* instances that proposals should ensure the green and blue network is maintained and enhanced, including the adaptation buffer zone.

### Edinburgh Airport Limited (0761)

As with any policy, the decision maker would consider the extent it is applicable to the proposal and site circumstances. As such it would not expect the bank opposite to a development site to be altered if this was not part of the proposal or within the applicant's ownership. **No modification proposed.**

### Water of Leith Conservation Trust (0392)

The Council considers the requirement for a buffer zone along water bodies to be

appropriately located in the Waterside Development policy. **No modification proposed.**

Crown Estate Scotland (The Forth District Salmon Fishery Board) (0346)

Issues relating to rights of access are not within the locus of the Planning process. **No modification proposed.**

Crosswind Developments Ltd (0184)

Env 29 will apply to many developments without a corresponding BGN proposal identified in table 1. Most the proposals in Table 1 also do not set out water course buffer zones. As such, inserting a cross reference between this policy and table 1 would therefore be of limited benefit. **No modification proposed.**

The following representations support the policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192), RSPB (0648)

### **Env 30 - Building Heights**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Stirling Developments Limited (0303)

The Council considers this policy is aligned with other policies in the City Plan, including Env 26 'Housing Density', whilst also addressing the issue of existing building heights. The issue of density requirements and compatibility with other matters such as townscape is addressed in Issue 12: Density. **No modification proposed.**

Crosswind Developments Ltd (0184), Melford Developments Ltd (0308)

The policy does not require development always accord with existing building heights, it is largely focused on setting where exceptions may be acceptable.

Where a non-allocated site would come forward for housing in the urban area Policy Env 26 'Housing Density' states that 'development must achieve an appropriate density having regard to....characteristics of the surrounding townscape, where this positively contributes to the character of the surrounding area'.

Capacities estimated for sites account for key requirements of the Plan including regard for what may be acceptable in the context of prevailing building heights in the surrounding area. Windfall urban area sites would be considered in the same way. Further matters regarding density and compatibility with existing townscape and context are addressed in Issue 12: Density.

The requirement for enhancement is particularly relevant if proposals would exceed prevailing heights and therefore have a greater visual impact. SPP CD096 paragraph 36. States that 'Planning's purpose is to create *better* places.' and draft NPF4 CD099 Policy 6 c) states that developments should contribute '...positively to the character and quality of the area...'. Env 30 reflects this. Policy Inf 15 'Edinburgh Airport Public Safety Zones' addresses issues relating to airport safeguarding and it is not necessary to duplicate this

in Policy Env 30. **No modification proposed.**

Pawel Stankiewicz (0445)

The modification proposed for criterion a. would permit detrimental impact from developments exceeding the prevailing height of an area. The Council considers this inappropriate, given potential for harm from cumulative impacts.

Criterion b. is considered appropriate in allowing a range of factors to be assessed in decisions on building design in context. Urban design and townscape impacts require careful consideration in the overall context, including viewpoints as this provides for.

The Council disagrees with the point on criterion c. The City has a unique character defined in part by the topography it is built on. If the perception of this underlying topography is lost then so too is identity and character of the City. Page 72 of draft NPF 4 CD099 and Paragraph 41 of SPP CD096 note that distinctiveness is one of the six qualities of a successful place which Planning should support. To the effect paragraph 41 states that 'This is development that complements local features, for example landscapes, topography, ecology, skylines, spaces and scales, streets and building forms and materials to create places with a sense of identity.'

, There are no regulations referred to in paragraph 3.152 however the Council considers this paragraph makes relevant points should be retained. **No modification proposed.**

Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644), Aviva Life and Pensions UK Limited (0598)

Criterion b. directly addresses ensuring proposals are appropriate to their context and varying sensitivities of different parts of the city, with criterion c. also accounting for heritage considerations. On giving weight to the positive effect a proposal may have on an area, this is adequately addressed by criterion a. **No modification proposed.**

Aviva Life and Pensions UK Limited (0598)

Subject policies do not make provision for specific locations. The Policy as proposed can be adequately applied to the specific circumstances at Haymarket. **No modification proposed.**

Leith Central Community Council (0614)

Design including the setting back top floors would be assessed each case by the decision maker. The Council considers the policy is clear as to when it should be applied i.e. where a proposal would rise above the prevailing building height of the area.

Consideration of enhancement of the skyline is dependent on the consideration the individual case and it is not practical to specify conditions on this as they might work for one context but not others.

Private views are not a material consideration, however, public views at a local level should be considered. Criterion b. of the policy can be used to assess this, with paragraph 3.152 making this clearer than the equivalent adopted LDP policy Des 11.

Air pollution as a result of any building is addressed in Policy Env 34 'Pollution and Air, Water and Soil Quality'. See Issue 16: Blue Green Infrastructure, Water and Environment Policies also.

The requirements for developments to provide public green amenity space, new vistas and additional social infrastructure are primarily addressed in policies Env 31 and 32 (see Issue 17), Env 25 (this issue) and Inf 1 (Issue 28) respectively. It is not appropriate to duplicate these requirements here and make them proportionate to building height. These policies are addressed in Issues 17 (Open Space policies), 11 (Design and Placemaking and 28 (Infrastructure Delivery - Community Facilities) respectively. **No modification proposed.**

#### Edinburgh World Heritage (0339)

Many proposals will accord with the prevailing building height, especially where this impacts on heritage, however the Council does not agree that where a proposal is higher than it's surrounding it should be a 'landmark'. Landmarks are designed to stand out. The Council considers that whilst all new buildings should have a positive impact, it is not always desirable for a new building, especially in a built heritage setting, to be designed to stand out.

The final sentence of paragraph 3.150 notes the importance of prevailing building heights especially in the context of the setting World Heritage Sites, Conservation Areas and Listed Buildings. It does not, however, state that this is only relevance of this policy. **No modification proposed.**

The following representations support the policy as proposed:

Grange/Prestonfield Community Council (0192), Leith Harbour and Newhaven Community Council (0776)

#### **Env 38 - Shopfronts**

##### Southside Community Council (0781)

The first sentence of this policy makes clear the threshold for compliance with the policy. The second (the part objected to) is not used to assess proposals but identifies examples of proposal types which are at greater risk of causing conflict with the policy threshold. The Council does not consider the wording is vague, nor that it implies inappropriate shopfronts in certain circumstances. **No modification proposed.**

##### Edinburgh World Heritage (0339)

Although the potential support from this funding source is positive, the role of City Plan is to set out the strategy, allocations and policies for future developments. The Council and Planning Service have other more appropriate routes with which to promote the fund. In that context the Council considers the reference to its design guidance is appropriate. **No modification proposed.**

**New proposed policy: Design standard uplift**

Suzanne McIntosh (0409)

The Plan's design policies include reference to where positive impacts are required, rather than just avoiding an excessively harmful effect e.g. criterion g of Policy Env 25 'Layout Design' requires that proposals 'create and retain attractive public views of the site', Policy Env 1 'Design Quality and Context' supports proposals 'where it is demonstrated that the proposal will create or contribute towards a vibrant, successful place.' Consequently the Council considers the proposed policies are sufficiently positive as proposed. **No modification proposed.**

**New proposed policy: Aircraft Noise**

Edinburgh Airport Noise Advisory Board (0691)

Policies Env 33 'Amenity' and Env 34 'Pollution, and Air, Water and Soil Quality' already set out that the amenity impact on future occupiers must not have an unacceptably adverse impact arising from noise. This is inclusive of scenarios where it new development itself would be subject to the impact. As such a new policy relating to aircraft noise is not considered necessary. **No modification proposed.**

Noise impact of aircraft adjacent to sites at West Edinburgh is addressed further in Issue 11: Design and Placemaking.

**General comment on all environment policies**

Tarmac (0244)

The Council notes that some policies are worded to the effect of stating that planning permission will be granted if proposals comply with the policy in question. This applies to the following policies: Env 3, Env 4, Env 5, Env 8 and Env 12. It is established policy language and the Council is not aware of any such misinterpretation occurring as it is sufficiently clear and established that planning applications are required to comply with more than just these or similar policies.

No modification proposed, however, should the Reporter be so minded the Council has no issue for the purposes of consistency in a modification that would have change the wording from stating '...planning permission will be granted...' (or similar) to '...proposals will be supported by this policy ...'

The following representations support the policy as proposed:

Grange/Prestonfield Community Council (0192)

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 12	Density	
Development plan reference:	Policy Env 26 Housing Density, City Plan Aim 1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Ambassador Group (0683)</div> <div>Archie Clark (0003)</div> <div>Barratt David Wilson Homes (0677)</div> <div>BDW Trading (0350)</div> <div>CALA Management Ltd (0465)</div> <div>CBRE Global Investors (0644)</div> <div>Cordatus Property LP (0533)</div> <div>Crosslane Co-Living SPV 2 Limited (0687)</div> <div>Crosswind Developments Ltd (0184)</div> <div>Dandara East Scotland (0757)</div> <div>Grange/Prestonfield Community Council (0192)</div> <div>Hallam Land Management (0457)</div> <div>Hallam Land Management (0599) (0615)</div> <div>Hazledene House Limited (0695)</div> <div>Homes for Scotland (0404)</div> <div>HUB Residential (0582)</div> <div>Inverdunning (Hatton Mains) Ltd (0427)</div> <div>James Forbes (0647)</div> <div>Juniper Green &amp; Baberton Mains Community Council (0306)</div> <div>Landowner of East Foxhall (0544)</div> <div>Leith Central Community Council (0614)</div> <div>Living Streets Edinburgh Group (0486)</div> <div>Melford Developments Ltd (0308)</div> <div>Miller Homes Limited (0649)</div> <div>Nuveen Real Estate (0564) (0734)</div> <div>Robertson Residential Group (0537)</div> <div>SAICA (0590)</div> <div>Simon Thomson (0248)</div> <div>Southside Community Council (0781)</div> <div>Steve Loomes (0767)</div> <div>Stewart Milne Homes (0118)</div> <div>Stirling Developments Limited (0303)</div> <div>Tarmac (0244)</div> <div>Taylor Wimpey (0200),</div> <div>Taylor Wimpey and Hallam Land Management Ltd (0603)</div> <div>The Association for the Protection of Rural Scotland (0334)</div> <div>Watkin Jones Group (0516)</div> <div>Wirght PDL (0078)</div>		
Provision of the development plan to which the issue relates:	Policy Env 26 Housing Density, City Plan Aim 1, Table 2 Housing Proposals and the combination of environment and design policies and site development principles within the plan.	
Planning authority's summary of the representation(s):		
Clarification needed on Env 26		
<u>Wirght PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)</u>		
Density is inappropriately defined. Developers would not typically include Open Space within the definition of a developable area as City Plan does. This means that the Council's definition of 65dph is actually 75dph for a developer exacerbating high density challenges.		



Archie Clark (0003), Wirght PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Juniper Green & Baberton Mains Community Council (0306),

The policy does not set an upper limit to density, which is unhelpful.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Southside Community Council (0781)

The Plan requiring high density for greenfield sites coming forward in Hou 4 implies support for these sites.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Southside Community Council (0781), Tarmac (0244)

Table 2 does not set out density requirements.

Leith Central Community Council (0614)

It is unclear if Appendix D part of City Plan. If it is not then it would be undemocratic for this to be altered by the Council by itself following adoption of the Plan.

### **Status of Env 26 relative to other policies**

Wirght PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

It is not clear whether this policy takes precedence over other environmental and design policies. This is a problem given the potential for conflict between Env 26 and these other policies.

### **Additional issues that should be addressed by Env 26**

Living Streets Edinburgh Group (0486)

This policy does not fully address other issues which are relevant to density, namely: the residential environment, living conditions and pedestrian priority.

### **Viability**

Crosswind Developments Ltd (0184), Hallam Land Management (0457), Robertson Residential Group (0537),

The extra cost of higher densities undermines viability and the delivery of other aspirations of this plan that also have additional cost such as net zero and to encourage more creative design freedom where this is appropriate.

### **High density compatibility with surrounding area, including built heritage, built form, building heights, urban edge, landscape and rural character**

Wirght PDL (0078), Stewart Milne Homes (0118), Crosswind Developments Ltd (0184),

Taylor Wimpey (0200), Tarmac (0244), Simon Thomson (0248), Stirling Developments Limited (0303), BDW Trading (0350), Homes for Scotland (0404), CALA Management Ltd (0465), Inverdunning (Hatton Mains) Ltd (0427), Hallam Land Management (0457) (0599) (0615), Robertson Residential Group (0537), Landowner of East Foxhall (0544), Taylor Wimpey and Hallam Land Management Ltd (0603), James Forbes (0647), Miller Homes Limited (0649), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), The Association for the Protection of Rural Scotland (0334), Melford Developments Ltd (0308), Ambassador Group (0683), HUB Residential (0582), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695)

No scope for site and space specific considerations and local context. It cannot simply be assumed that higher density equates to better design, mix and place making in all scenarios. This undermines the achievement of other policies in the Plan, in particular the more balanced design policies such as Env 4 and Env 6.

The proposed plan provides no evidence that this density will be deliverable on the proposed brownfield housing sites.

Density at urban edge in particular should not be high given the generally low existing density of these areas and the rural context of the green belt edge where high density would have a detrimental impact on the character of natural and rural landscapes. This includes sites which come forward under Policy Hou 4 which are needed to remedy any identified shortfall in the Council's housing land supply

The densities assumed for allocated sites appear arbitrary and not physically justified. These have not been tested by the development industry.

### **Policy does not sufficiently promote density**

Watkin Jones Group (0516), Southside Community Council (0781), Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

The densities stated in the revised policy are not particularly dense and do not make efficient use of limited space. 100 dwellings per hectare is similar in density to a Victorian 4-storey perimeter block in Marchmont. This is not a particularly dense minimum for high-density urban areas. Densities should be maximised but also informed by the surrounding context to utilise limited urban development sites across the city and, where appropriate, should look to increase building heights and densities.

### **High density impact on housing mix**

Wirght PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), Tarmac (0244), BDW Trading (0350), Homes for Scotland (0404), Hallam Land Management (0457), Robertson Residential Group (0537), Landowner of East Foxhall (0544), Taylor Wimpey and Hallam Land Management Ltd (0603), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

Meeting the inflexible requirements of this policy would rule out the types of homes that are under-represented in Edinburgh's current housing stock and that are seeing such a surge in demand at present, particularly housing for families and/or an ageing population. There is conflict here with paragraph 15 of SPP, which states the need to provide choice

over where to live and style of home. The net effect will be families leaving the city to access appropriate homes.

The shortcomings of the density requirements are clear in analysis provided by EMA submitted with this representation which demonstrates that getting close to the 65dph threshold based on net developable area would significantly limit the house types which could be provided. To reach this density a 50/50 split of 4 storey flats and 2 storey housing would be required and 2/3 of the housing would need to be terraced

House builders are clear it is no simple process to fundamentally change standard house types in the short term. The townhouses, colonies, tenements/flats that would need to come to the fore to achieve this density requirement are not a major part of the current mix of new homes.

Env 26 contradicts Hou 3 (particularly part b) given it will limit housing mix which is required as part of Hou 3. Restricting the range of housing types delivered by development is also an important point in relation to a 10 year LDP – where the local market in certain areas has the potential to change considerably within this timeframe.

### **High density compatibility with amenity, open space/green blue infrastructure**

Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), Tarmac (0244), BDW Trading (0350), Homes for Scotland (0404), Hallam Land Management (0457), Taylor Wimpey and Hallam Land Management Ltd (0603), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Crosswind Developments Ltd (0184)

Adverse impact on amenity and air quality as well as lack of space to fit in blue green infrastructure and open space. Even where these extra requirements such as amenity standards can be accommodated within higher density developments then delivering them comes at a higher cost.

Policy Env 32 Useable Communal Open Space and Private Gardens in Housing Development which state “a minimum of 20% of total site area should be useable open space and/or private gardens” could pose problematic for design, viability and deliverability.

### **Impact on infrastructure, open space and services**

Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

High density puts a greater strain on services and infrastructure.

Archie Clark (0003), Leith Central Community Council (0614), Juniper Green & Baberton Mains Community Council (0306), The Association for the Protection of Rural Scotland (0334)

Increases in population density need to ensure open space is protected and provided as well as being able to be accessible within walking distance (including the length of

stairwells in flats). This is especially relevant for already dense areas like Leith should be accompanied by a mandatory percentage increase in publicly accessible quality green spaces (as well as other infrastructure, police, electricity, water, surface water).

#### **Modifications sought by those submitting representations:**

##### Archie Clark (0003)

It is indicated that there should be a maximum limit for densities given the inability for developments to accommodate key features such as open space once such a limit is exceeded.

Also indicated that Table 2 should show the density of development as this will help identify the scale of the facilities needed to support developments.

Amend paragraph 2.109 to state that the Council 'reserves the right to raise density levels where appropriate across the existing built environment to 65-100 or 175 dwellings per hectare'. This avoids implying green belt and countryside developments may be permitted if they are dense enough.

##### Wirght PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

Indicated that the policy should be amended to remove the blanket requirement for all homes delivered through Policy Hou 4 (which could be either greenfield or brownfield) to be at densities of at least 65 dwellings per hectare.

The wording to be changed to "On other sites where the principle of housing is acceptable, development must seek to achieve an appropriate density having regard to:", to enable more flexibility in the decision-making process.

##### Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350)

The final paragraph of the policy should be amended as follows, additions are in capitals, deletions are not shown as the Council's proforma does not allow struck through text.

Housing proposals which come forward through Policy Hou 4 - Housing Land Supply must deliver *optimal densities taking into account the site characteristics, location and surrounding area*.

If a minimum threshold is maintained, and we would not support this the definition of developable area should be exclusive of open space.

##### Tarmac (0244)

- Assess on a site by site basis in conjunction with En26 Layout Design.
- Present actual predicted/required density per hectare for each allocated site in Part 4 Table 2.
- The requirement to deliver 65+ dwellings per hectare on sites that come forward through Hou 4 should be removed. The wording 'appropriate density' should suffice.

Simon Thomson (0248), Stirling Developments Limited (0303), Homes for Scotland (0404), Landowner of East Foxhall (0544), James Forbes (0647), Ambassador Group (0683)

It is indicated that the reference to 65dph should be deleted and replaced with a reference to the need for density to be suitable for the site context.

Taylor Wimpey and Hallam Land Management Ltd (0603)

For housing sites coming forward under Hou 4 then the requirement to 65dph should be replaced with a reference to the need for density to be suitable for the site characteristics, location and surrounding area.

Juniper Green & Baberton Mains Community Council (0306)

It is indicated that parts of the Plan which set out a density requirement of at least 65 dph in countryside / Green Belt locations should be amended so that it is clear this does not imply support for development in these locations. For example section 2.109, page 29.

Melford Developments Ltd (0308)

It is indicated that this policy should be deleted or amended so as to address the fact it is imprecise and it is unclear in practice, relating to an appropriate density. All housing proposals in Table 2 should be reviewed to be appropriate to the physical circumstances of the site and surrounding area.

Inverdunning (Hatton Mains) Ltd (0427)

Delete third paragraph.

Hallam Land Management (0457), Robertson Residential Group (0537)

Request that the section which imposes a minimum limit on the density of greenfield development brought forward through Policy Hou 4 should be removed, so that the policy reads:

*'Sites identified to deliver housing in this Plan should provide density and dwelling numbers in line with that set out for the relevant site in Part 4, Table 2. On other sites where the principle of housing is acceptable, development must achieve an appropriate density having regard to:*

- a) the characteristics of the site and those of the surrounding townscape, where this positively contributes to the character of the area*
- b) the need to create an attractive residential environment and safeguard living conditions within the development*
- c) the accessibility of the site to public transport, in particular recognising the role of transport corridors; and*
- d) the need to encourage and support the provision of local facilities necessary to high quality walkable neighbourhoods.'*

CALA Management Ltd (0465), Hallam Land Management (0599) (0615), Miller Homes

#### Limited (0649)

The purpose of Policy HOU 4 is to allow additional sites to come forward (within the green belt or countryside) when a shortfall in the Council's housing land supply is identified. These sites are not conducive to the densities proposed by the Council which are more suited to brownfield sites within the existing urban area. This is due in part to the larger areas of open space associated with such development, which reduce the net developable area.

The current wording of Policy ENV 26 places an unnecessary and unjustified restriction on housing sites within the green belt or countryside being brought forward to remedy any identified shortfall in the Council's housing land supply.

Amend policy to read as follows:

*Sites identified to deliver housing in this Plan should provide density and dwelling numbers in line with that set out for the relevant site in Part 4, Table 2.*

*On other sites where the principle of housing is acceptable, development must achieve an appropriate density having regard to:*

*a. the characteristics of the site and those of the surrounding townscape, where this positively contributes to the character of the area*

*b. the need to create an attractive residential environment and safeguard living conditions within the development*

*c. the accessibility of the site to public transport, in particular recognising the role of transport corridors; and*

*d. the need to encourage and support the provision of local facilities necessary to high quality walkable neighbourhoods.*

*Housing proposals which come forward through Policy Hou 4 - Housing Land Supply must deliver a density which is demonstrated to be appropriate for its surrounding context.*

#### Living Streets Edinburgh Group (0486)

Modify criterion b. to read as follows:

*"b. the need to create an attractive residential environment with pedestrian priority and safeguard living conditions within the development"*

#### Watkin Jones Group (0516)

It is indicated that the level of density required in policy Hou 4 should be increased.

HUB Residential (0582), Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695)

General support for higher densities on appropriate, well-connected sites however this

must be considered on a site-by-site basis in relation to the site's characteristics and considered holistically with other planning considerations such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space.

Southside Community Council (0781)

This policy must be clearer that it applies to speculative proposals.

The wording 'appropriate density' should be replaced with a more definitive requirement for higher density development.

Archie Clark (0003), Wirght PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

The policy should provide clarity on what high density means and what is the upper limit for density.

Wirght PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

Clarity should be provided on what takes precedence where there is a conflict between density and other issues such as open space?

Request further evidence that all the requirements for housing development have been considered jointly and proven to be reasonable and viable.

Crosswind Developments Ltd (0184)

Seek an amendment to Policy Env 26 Housing Density (Page 114) as set out below:

*"Housing proposals which come forward through Policy Hou 4 - Housing Land should aim for a density of dwellings of at least 65 dwellings per hectare as averaged across the overall site's residential developable area (this should be inclusive of open space but excluding other non-residential uses). Where this is not achievable a reasoned justification should be provided".*

Juniper Green & Baberton Mains Community Council (0306)

Housing proposals in Table 2 should set out density requirements

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Amend policy to read as follows:

*Sites identified to deliver housing in this Plan should provide density and dwelling numbers in line with that set out for the relevant site in Part 4, Table 2.*

*On other sites where the principle of housing is acceptable, development must achieve an appropriate density having regard to:*

*a. the characteristics of the site and those of the surrounding townscape, where this positively contributes to the character of the area*

*b. the need to create an attractive residential environment and safeguard living conditions within the development*

*c. the accessibility of the site to public transport, in particular recognising the role of transport corridors; and*

*d. the need to encourage and support the provision of local facilities necessary to high quality walkable neighbourhoods.*

*Housing proposals which come forward through Policy Hou 4 - Housing Land Supply must deliver a density which is demonstrated to be appropriate for its surrounding context.*

Leith Central Community Council (0614)

Clarity should be provided on whether the Development Principles set out in Appendix D are actually parts of the final document or are they at risk of being amended without public scrutiny.

Increases in population density for already dense areas like Leith should be accompanied by a mandatory percentage increase in publicly accessible quality green spaces (as well as other infrastructure, police, electricity, water, surface water).

Juniper Green & Baberton Mains Community Council (0306).

It is indicated that there should be an upper limit for density to make clear that it does not prevent new developments from meeting open space accessibility requirements.

Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

In line with supporting paragraph 3.124, the actual policy text should give greater positive weight to the fact that increasing density and building heights can also enhance an area's character and lead to better placemaking, particularly where there is limited historic character and where visual focal points may enhance otherwise featureless townscapes.

The Association for the Protection of Rural Scotland (0334)

Density at urban edge in particular should not be high given the generally low density of these areas and the rural context of the green belt edge.

**Summary of responses (including reasons) by planning authority:**

The following representations support Policy 26 'Housing Density' as it is proposed:

Grange/Prestonfield Community Council (0192), Parabola Edinburgh Limited (0723)

**Clarification needed on Env 26**



Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

The policy states that allocated development should be in line with the capacities stated in Table 2 (Housing Proposals) of the Plan and other sites must achieve an appropriate density relative to other factors. The Edinburgh Design Guidance CD047 provides further information on how density is calculated. This includes how to calculate the density of mixed use developments. Page 32 notes that discretion will be used when calculating the density of mixed use developments. **No modification proposed.**

Archie Clark (0003), Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Juniper Green & Baberton Mains Community Council (0306),

The Council does not agree there should be an upper limit on density. The design policies of the Plan allow a judgement about any limit on a case-by-base basis, with Env 30 (Building Heights), Env 1 (Design Quality and Context), Env 4 (Development Design – Impact on Setting) as well as Env 26 (Housing Density) itself. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Southside Community Council (0781)

The Council considers there is sufficient clarity over the meaning of density in the context of this policy. The Council does not agree with concerns that there is an implied support for green belt/countryside sites in the Plan; density considerations would only come into play if such sites were required in respect of the housing land supply shortfall. The proposals map, site allocations and subject policies makes clear where housing development is considered suitable in the Plan. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Southside Community Council (0781), Tarmac (0244)

The Council considers table 2 does not need to state density levels since it already has estimated capacity levels which is the more important information. Providing this in table 2 is not necessary. Density levels can be extrapolated if desired. **No modification proposed.**

Leith Central Community Council (0614)

The Council considers it clear as it stands that Appendix D is part of City Plan. **No modification proposed.**

### **Status of Env 26 relative to other policies**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

The Council does not agree this policy needs to specify what priority it has relative to other policies. The weighting of different policies of the Plan is for the decision maker to

consider in each case. **No modification proposed.**

**High density compatibility with surrounding area, including built heritage, built form, building heights, urban edge, landscape and rural character**

Wright PDL (0078), Stewart Milne Homes (0118), Crosswind Developments Ltd (0184), Taylor Wimpey (0200), Tarmac (0244), Simon Thomson (0248), Stirling Developments Limited (0303), BDW Trading (0350), Homes for Scotland (0404), CALA Management Ltd (0465), Inverdunning (Hatton Mains) Ltd (0427), Hallam Land Management (0457) (0599) (0615), Robertson Residential Group (0537), Landowner of East Foxhall (0544), Taylor Wimpey and Hallam Land Management Ltd (0603), James Forbes (0647), Miller Homes Limited (0649), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), The Association for the Protection of Rural Scotland (0334), Melford Developments Ltd (0308), Ambassador Group (0683), HUB Residential (0582), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695)

Policy Env 26 is to be read with other environment and design policies of the Plan. This means due consideration of context is required as part of any development design. If applicable to the site circumstances, this may mean having regard to building heights as well as an urban edge context.

The Council disagrees with concerns around the requirement of 65 dwelling per hectare if sites need to come forward to mitigate a significant housing land shortfall. If sites were to be required under Policy Hou 4 they would be expected to be of a size that a net density figure of 65 dwelling per hectare in order to make the most efficient use of land, achieve 20 minute neighbourhoods and build sustainable communities which support local facilities and public transport. Irrespective of density, a proposal would still need to demonstrate acceptable townscape and landscape outcomes. A competent design process and skilled designers can achieve this.

Where housing proposals have a capacity stated, this has included consideration of the surrounding area, including the density appropriate to the site context, including building heights. **No modification proposed.**

**Additional issues that should be addressed by Env 26**

Living Streets Edinburgh Group (0486)

The Council does not consider this proposal needs to specify matters relating to the residential environment, living conditions and pedestrian priority as these are addressed in other City Plan policies such as Env 25 'Layout Design'. **No modification proposed.**

**Viability**

Crosswind Developments Ltd (0184), Hallam Land Management (0457), Robertson Residential Group (0537).

The Council has not been presented with evidence that higher density developments reduce viability. They are not considered to introduce inherently prohibitive costs that cause viability issues. The need for medium and higher densities is well documented in the plan and should be factored into the development and design of sites. **No**

**modification proposed.**

### **Insufficient in promoting density**

Watkin Jones Group (0516), Southside Community Council (0781), Cordatus Property LP (0533), Nuveen Real Estate (0564) (0734), SAICA (0590), CBRE Global Investors (0644)

The Council considers the policy already makes clear that high densities are supported where these would be appropriate to the context and this would support densities above the level of 100dph, where suitable. **No modification proposed.**

### **High density impact on housing mix**

Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), Tarmac (0244), BDW Trading (0350), Homes for Scotland (0404), Hallam Land Management (0457), Robertson Residential Group (0537), Landowner of East Foxhall (0544), Taylor Wimpey and Hallam Land Management Ltd (0603), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

Evidence has been submitted illustrating the effect of density at 65 dwellings per hectare on housing mix, showing a mix of 4 storey flats alongside mainly two storey terraced style units. The Council welcomes an approach which achieves a mix of housing types at higher densities including terraced properties and flats and considers there is further scope for flexibility in mix than as indicated in the representee's supporting document. Flats, colonies, four in a block, terraces, mews houses and townhouses can all be incorporated to increase densities. Colony flats are an example of a popular Edinburgh house type that is compatible with the need for family homes in line with draft NPF4 CD099 Policy 9 (f) and SPP CD096 requirements for a range and choice of homes.

The Council accepts such a mix may represent a change in standard house types provided by some house builders, however there are no practicable reasons why generally higher density housing mixes cannot be provided. Most developers already provide flats, colonies and terraced houses in their offering and have demonstrated that appropriate and viable housing types are deliverable. **No modification proposed.**

### **High density compatibility with amenity, open space/green blue infrastructure**

Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), Tarmac (0244), BDW Trading (0350), Homes for Scotland (0404), Hallam Land Management (0457) (0615), Taylor Wimpey and Hallam Land Management Ltd (0603), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Crosswind Developments Ltd (0184), Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Crosswind Developments Ltd (0184)

The Council disagrees that increased density is incompatible with other policy requirements and aims of the plan. Increased density is an important factor in achieving 20 minute neighbourhoods and communities which sustain local facilities and public transport, whilst making the most efficient of the limited space the city. It ensures sites are not under-developed. Increasing density can also enhance an area's character and lead to better placemaking, providing visual focal points. It is not considered that a development is inherently unachievable by being required to meet the necessities of sustainable

development such as open space, meeting the needs of affordable housing provision and being built at an appropriate density. These factors should be considered as part of the acquisition, initial layout and eventual detailed design of a development

Appendix 1 of the Housing Study supporting Choices for City Plan CD026 provides illustrations of how green blue infrastructure and greenspace/open space can be provided at different density scales. Walking distances to open space can be provided at high densities. The Council's Open Space Strategy CD066 illustrates this with Figures 4 and 8 showing which areas of the city have walkable access to Large and Local standard spaces respectively – with high density parts of the city being as well served as many lower density parts.

The Council has not been presented with evidence that higher density developments reduce viability. They are not considered to introduce inherently prohibitive costs that cause viability issues. The density of an allocated site and the requirements of policy Env 26 should be factored into the initial planning and development of the site. **No modification proposed.**

#### **Impact on infrastructure, open space and services**

Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767)

The Council has undertaken strategic assessment of the impact of the proposal on a range of key infrastructure types such as transport CD014, education CD015 and Healthcare CD016. This has taken account of the allocations and developments proposed, including density to ensure impacts on existing infrastructure can be sufficiently mitigated. Issue 27: Infrastructure Delivery and Developer Contributions addresses this. For non-allocated sites coming forward at higher densities, relevant Plan policies will apply so as to ensure relevant infrastructure impacts can be mitigated if the proposal is otherwise appropriate. Policy Inf 3 'Infrastructure Delivery' is particularly relevant. The Council considers that density can support better local services and amenities by providing a necessary critical mass of population. **No modification proposed.**

Leith Central Community Council (0614), Juniper Green & Baberton Mains Community Council (0306), The Association for the Protection of Rural Scotland (0334)

The Council considers the provisions of the Plan are sufficient to ensure appropriate access to open space, including when new developments are proposed. 17: Open Space Policies consider open space provision in further detail. An upper limit on density is not necessary to ensure that these policies are still applicable. **No modification proposed.**

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

Issue 13	Sustainable Design	
Development plan reference:	Policies Env 7 Sustainable Developments and Env 8 New Sustainable Buildings, Aims	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Ambassador Group (0683) Andrew Heald (0566) Archie Clark (0003) Aviva Life and Pensions UK Limited (0598) Barratt David Wilson Homes (0677) BDW Trading (0350) CALA Management Ltd (0465) Cockburn Association (0777) CoMoUK (0728) Cramond &amp; Barnton Community Council (0243) Crosslane Co-Living SPV 2 Limited (0687) Crosswind Developments Ltd (0184) Defence Infrastructure Organisation (0124) Edinburgh Airport Limited (0761) Edinburgh Napier University (0731) Edinburgh World Heritage (0339) Elgin Haymarket Limited (0292) Grange/Prestonfield Community Council (0192) Hallam Land Management (0599) (0615) Hazledene House Limited (0695) Homes for Scotland (0404) HUB Residential (0582) Jean Morley (0461) John Bremner (0282) Juniper Green &amp; Baberton Mains Community Council (0306) Kyle Worgan (0272)</div><div>Lady Road Investment S.A.R.L. (0625) Leith Central Community Council (0614) Leith Harbour and Newhaven Community Council (0776) Living Streets Edinburgh Group (0486) Miller Homes Limited (0649) Mrs Patricia Stott (0349) NHS Lothian (0596) Parabola Edinburgh Limited (0723) Prof D N Bateman (0004) Richard Marsh (0165) S Harrison Developments Limited (0460) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) Scottish Wildlife Trust Lothian group (0560) SEPA (0012) Southside Community Council (0781) Steve Loomes (0767) Stewart Milne Homes (0118) Summix Capital Limited (0747) Taylor Wimpey (0200) Taylor Wimpey and Hallam Land Management Ltd (0603) Tiger Developments Ltd (0602) University of Edinburgh (0464) Watkin Jones Group (0516) West Town Edinburgh Ltd (0660) Wright PDL (0078)</div></div></div>		
Provision of the development plan to which the issue relates:	These policies set out criteria to be considered in the design of new development and protection of the historic environment.	
Planning authority's summary of the representation(s):		
Env 7 – Sustainable Developments		
<u>Elgin Haymarket Limited (0292), Wright PDL (0078), Barratt David Wilson Homes (0677), Wright PDL (0078), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), Steve Loomes (0767)</u>		

The final paragraph of this overly complex policy is fundamental to the delivery of the City Plan Aims and Spatial Strategy, which rely exclusively on existing sites within the urban area to deliver the City's substantial planned growth over the next ten years. These sites are rarely vacant.

Greenfield sites by comparison do not involve the loss and redevelopment of embodied carbon.

The policy is insufficiently clear and precise however and means open-ended interpretation will cause delays to the delivery of employment, housing and other land uses. Particular clarity is needed on what carbon assessments should entail.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Does the Council have the expertise in 'Planning' to assess this?

Archie Clark (0003),

Is the requirement for carbon assessment appears not duplicating Building Regulations and therefore not necessary?

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The National Planning Framework 3 vision for a low carbon place is one with a more energy efficient built environment and Scottish Planning Policy paragraph 157 is clear LDPs should support development that delivers energy efficiency. Taking this further the draft NPF4 Policy 2 'Climate Emergency' is clear that all development should be designed to minimise emissions and identifies the situations where emissions evidence is needed.

Policy ENV7 Sustainable developments does not currently clearly require sustainability statements for new development to demonstrate low or net zero in use emissions and the whole life carbon footprint requirement only applies to replacement buildings.

Andrew Heald (0566), Leith Central Community Council (0614), Cockburn Association (0777), Leith Harbour and Newhaven Community Council (0776)

These proposals do not adequately address the issue of embodied carbon in construction. Up to 50% of the whole life carbon emissions of a new building is embodied carbon.

It is unacceptable that the policy provides exceptions to the sustainability requirements it sets out such as where a replacement building provides additional floorspace and/or dwellings compared to the existing building."

Submitted carbon assessments and sustainability statements should have to be certified and assessed by independent, qualified professionals to ensure they are reliable and thorough.

Crosswind Developments Ltd (0184), CALA Management Ltd (0465), Hallam Land Management (0615), Miller Homes Limited (0649), Barratt David Wilson Homes (0677)

The policy as worded simply refers to detailed proposals without defining the level of detail in the application.

This policy could potentially be attributed to Planning Permission in Principle applications. This requested level of detail will hinder the Planning Permission in Principle process, ultimately making the purpose of this type of application redundant.

Cramond & Barnton Community Council (0243), Mrs Patricia Stott (0349), Jean Morley (0461)

This policy does not address the fact that home working (full-/part-time) has become a common element of the lifestyle of many employed people and should be encouraged as part of climate change mitigation measures (e.g reduced commuting requirements) and to help achieve 20 minute neighbourhoods.

Kyle Worgan (0272)

This section does not adequately address biodiversity.

University of Edinburgh (0464)

City Plan must progress a managed approach to ensure that realistic and stretched targets and objectives are set that reflect the wider operation and journey that the University has committed. In particular so as to reach net zero by 2040, with associated work including its Climate Strategy, Energy Masterplan and the work of the Department for Social Responsibility and Sustainability (SRS). In this context, this may justify non-compliance in certain cases against this policy in terms. As technologies improve and associated affordability and viability becomes more acceptable it is hoped that these situations will become rarer.

CALA Management Ltd (0465), Miller Homes Limited (0649), Hallam Land Management (0615) Barratt David Wilson Homes (0677)

The Council has not defined what information is required to be submitted by an applicant in the required Sustainability Statement.

Defence Infrastructure Organisation (0124), University of Edinburgh (0464), Watkin Jones Group (0516)

This policy must make allowance for the specific challenges of incorporating mitigation measures when converting listed buildings, including how these impact on heritage significance but in relation to viability considerations. This is especially so in situations relating to the estate of the University of Edinburgh or on sites such as Redford Barracks which have a significant number of listed buildings, many of which are large in scale. This should be reflected in the wording "incorporate all reasonably practicable measures".

Living Streets Edinburgh Group (0486)

This policy should be modified.

Andrew Heald (0566)

Any new building built using concrete and/or steel is NOT sustainable – these are finite resources. The current policy undermines Edinburgh's Net Zero 2030 commitments and leave the Council open to accusation of false carbon accounting.

Other cities are addressing embodied Carbon in their plans and for example mandating timber. Amsterdam has mandated that 20 per cent of all new housing projects in the Dutch capital must be constructed with wood or other biobased materials from 2025. Hackney declared a presumption in favour of using sustainable timber in all new build projects.

#### CoMoUK (0728)

Amend the policy to include a commitment to shared transport that would enshrine a 'whole-development' approach to decarbonisation.

#### Edinburgh Napier University (0731)

This policy does not have references to the partnership working to ensure the effective delivery of policy aims. As well as the 2030 Climate Strategy as this is a significant document for all development in the city that already promotes collaborative ways of working to address the climate emergency.

There should be greater emphasis importance of 'adaptation' and 'resilience' within the scope of the policies.

Build-in the ability to update policies in future so they can be influenced, adapted and updated as necessary, as and when new opportunities arise in respect of environmental sustainability, as well as in relation to new legislation coming forward and changes in national expectations.

Development proposals should also be required to demonstrate how they have made a significant attempt to move away from private car reliance and have promoted public transport usage.

'Biodiversity' should be included within the scope of the Policies and that wildlife habitats and water attenuation should not just be referenced in respect of green roofs.

#### Edinburgh Airport Limited (0761)

The policy should be reworded requiring developments to address the criterion where achievable and possible, to allow development to be assessed for the required measures on a case by case basis, so as to provide more flexibility.

#### Edinburgh World Heritage (0339)

Demolishing existing buildings and constructing new ones will generate significant amount of carbon emissions before starting to contribute to the city's carbon emissions reductions. The re-use of existing buildings is inherently sustainable and should be the default, particularly in Edinburgh which has an exceptionally high number of historic buildings that should be protected. Traditional buildings are specific due to their design, construction



techniques and materials, therefore they require the adequate carbon emission calculation methodologies to be accurate.

To address a significant risk of negatively impacting the character, Outstanding Universal Value and designated status of the Old and New Town World Heritage Site as a result of development pressures. It will be important to consider how a decision will be made if comparative assessment fails.

## **Env 8 – Sustainable Buildings**

Archie Clark (0003), Wright PDL (0078), Summix Capital Limited (0747), Barratt David Wilson Homes (0677), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), S Harrison Developments Limited (0460), HUB Residential (0582), Ambassador Group (0683), Hazledene House Limited (0695), Steve Loomes (0767), Stewart Milne Homes (0118).

Do not support the Council's decision to depart from national Building Standards. New homes are now 75% more efficient than they were in 1990. Further reductions in carbon dioxide will be required when building standards are updated in 2021, with further planned changes again in 2024 preventing the installation of gas boilers. Home builders are committed to keeping pace with national changes to building standards.

Duplicating Building Standards requirements risks creating conflict, delay and uncertainty and creating deliverability and viability issues.

At a national level this change also encourages economies of scale and efficiency than a patchwork of different locally set requirements.

No evidence has been provided to demonstrate that the higher standards in this policy can be achieved in practical and financial terms, including in areas such as Edinburgh.

Lack of engagement with the home building industry to determine the extent to which these requirements are deliverable and viable.

No evidence of any research on the existing grid capacity and impacts, including account for the effect of the high-density strategy, current network demand, nor what upgrades would be required to facilitate the requirements of this policy, particularly in areas where a significant volume of new high-density development is proposed such as North-East Edinburgh.

As the applicant is often not going to be the party constructing the building, this policy seems to be being directed at the wrong party. Providing a 'statement' of intent followed by a planning condition is not the same thing as providing a detailed design and thus difficult to impose.

University of Edinburgh (0464)

The long term viability of living roofs is not yet proven. These pose operational and maintenance challenges adding to the annual cost of maintaining buildings.

The University has a number of highly serviced buildings such as research institutes and laboratories which are extremely challenging to deliver as net Carbon Zero. From an initial

review achieving Platinum Standards would have added at least a further 10-15% of cost to each Capital Project. Strict application of this policy in all cases could hinder growth, investment and the positive contribution that the university makes to the city and surrounding economy.

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761), Summix Capital Limited (0747)

Certain requirements are not achievable or appropriate in all circumstances, often due to site circumstances, and therefore are overly restrictive to development. For example, requirements such as green roofs to provide wildlife habitat and water attenuation are not a feasible option for development at the airport due to aviation safety. The airport could not necessarily support green roofs on development sites at West Edinburgh and Maybury due to these safeguarding issues.

Grange/Prestonfield Community Council (0192)

The difference in requirements for Major and Local development should be removed so all development as defined in 3.99 must meet Parts A *and* B of the present S1 form and beyond.

John Bremner (0282)

This policy only *encourages* Passivhaus but does not *require* it. Passivhaus standards have already been met in 2021 by local authority housing in Agar Grove, Camden, UK (216 new council homes, 37 homes at Camden Living Rent). This is needed now to ensure all new development in Edinburgh meets net zero and to ensure affordability for people living in new developments in Edinburgh to heat and power their homes without damaging the environment.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Barratt David Wilson Homes (0677)

Not all new buildings, especially those needing to adopt traditional design in terms of materials and detailing, should meet net zero greenhouse emissions.

Edinburgh Napier University (0731)

This policy does not have references to the partnership working to ensure the effective delivery of policy aims. As well as the 2030 Climate Strategy as this is a significant document for all development in the city that already promotes collaborative ways of working to address the climate emergency.

There should be greater emphasis importance of 'adaptation' and 'resilience' within the scope of the policies.

Build-in the ability to update policies in future so they can be influenced, adapted and updated as necessary, as and when new opportunities arise in respect of environmental sustainability, as well as in relation to new legislation coming forward and changes in national expectations.

Development proposals should also be required to demonstrate how they have made a significant attempt to move away from private car reliance and have promoted public transport usage.

'Biodiversity' should be included within the scope of the Policies and that wildlife habitats and water attenuation should not just be referenced in respect of green roofs.

Edinburgh Airport Limited (0761)

The policy should be reworded requiring developments to address the criterion where achievable and possible, to allow development to be assessed for the required measures on a case by case basis, so as to provide more flexibility.

Leith Central Community Council (0614)

How are these plans being enforced once Planning is granted? Will notices be issued if these roofs are not properly maintained? Can the developer be held responsible for the maintenance?

**Existing Buildings**

Archie Clark (0003), Prof D N Bateman (0004), Homes for Scotland (0404)

City Plan 2030 does not address current building stock. The great majority of Edinburgh buildings will not undertake any sustainability improvements. Even new estates being currently built, especially private ones, are not at a standard required to meet environmental zero carbon targets set in this policy document. Why wait til 2030? This should be done now.

**Use of key terms**

Archie Clark (0003)

An emergency is something that arises suddenly and is dealt with in a short timescale whereas 'Climate Change' has been happening for centuries but currently has been speeding up, and looks like continuing to accelerate over the next century when its 'emergence' will have been long established.

Text is hard to read and contains buzz words that seem to have no contextual reference – e.g. "The development creates an attractive, biodiverse sustainable drainage system".

**Modifications sought by those submitting representations:**

**Env 7 – Sustainable Development**

Elgin Haymarket Limited (0292)

Paragraph 3.98: needs to provide quantifiable metrics that enables the development industry to make informed decisions based on defined targets, for example CIBSE Guide / LETI Climate Emergency Design Guide / RIBA 2030 Climate Challenge Targets, to make sure the metrics are consistent across all development proposals.

The policy and supporting text should acknowledge that, in many instances an existing building will be replaced by one or more buildings and be mixed-use, resulting in a disproportionate comparative carbon assessment. Weighting must also be given to the benefits of increased densification of city centre brownfield sites and reductions in travel emissions with sites close to public/active transport. It should also be acknowledged that not all buildings are suitable for retrofit.

Archie Clark (0003)

It is indicated the requirement for carbon assessments should be deleted if it is already required by Building Standards.

Juniper Green & Baberton Mains Community Council (0306)

The means of measurement should be explained for quantifying benefit of new buildings/floorspace in addition to carbon emissions. For example, if the new proposal doubled office capacity but the footprint increased by a lesser amount, then that would be advantageous.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The text on ENV 7 could be strengthened so that sustainability statements make low emissions/net zero is a criterion for new buildings in terms of their 'in use' emissions. It is also indicated that a whole life emissions assessment could also be considered for new buildings (whether replacing existing buildings or not).

Leith Central Community Council (0614), Andrew Heald (0566), Cockburn Association (0777)

It is indicated that the policy should remove the potential for redevelopment proposals to permitted if factors such as additional floorspace are considered to outweigh a net negative carbon footprint.

Submitted carbon assessments and sustainability statements should have to be certified and assessed by independent, qualified professionals to ensure they are reliable and thorough.

Andrew Heald (0566)

It is indicated that the policy should make clearer provision for embodied carbon in its carbon assessments and close the exemption for proposals to have a negative net carbon footprint if they provide other benefits such as additional floorspace compared to an existing building.

City Plan must set an annual carbon budget, with the carbon footprint of new construction measured and recorded. Developers should be taxed on the embodied carbon in their development and the funds raised used in the management of green infrastructure in the city.

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404),

The section of the policy setting out additional matters to address in the Sustainability Statement should be deleted. This deals with matters relating to detailed specification for the fabric and construction of buildings, which are more appropriately considered through Building Standards

CALA Management Ltd (0465), Hallam Land Management (0599) (0615), Miller Homes Limited (0649), Barratt David Wilson Homes (0677),

This policy should define the type of planning application which will require the submission of a Sustainability Statement, and that this set out that this is only required for detailed proposals.

The detail required in a Sustainability Statement should be defined to assist all applicants understand the assessments required, including information on what is needed in terms of future adaption and long-life construction. This should be done through the use of supplementary guidance such as the Edinburgh Design Guidance rather. This avoids matters being out of date during the lifetime of the adopted LDP. It also adds a further consultation process for the benefit of the public, applicants and the Council.

The amended policy should read as follows:

*All detailed proposals submitted as either applications for Planning Permission or Approval of Matters Specified in Conditions involving the construction or change of use of one or more buildings\* must incorporate all reasonably practicable measures to address the climate emergency and contribute to sustainable living, with this being demonstrated through a Sustainability Statement which addresses the following:*

*a. how the proposal integrates measures to both mitigate and futureproof the building against the effects of the climate emergency, particularly with regard to the increased frequency and severity of extreme temperature and storm/ rainfall/flooding events as well as sea level rise and erosion, and*

*b. how the proposal encourages all forms of active travel (including complying with Edinburgh's Street Guidance and associated Factsheets) and shall be accessible by those of all ages and levels of mobility, including those with disabilities.*

*The detailed information to be submitted in this Sustainability Statement will be defined through supplementary guidance.*

*In addition to the above, the Sustainability Statement must also address the matters set out below:*

*For developments involving new buildings the statement shall set out how the development has been designed to be of long-life construction and to allow future adaptation for different uses as well as utilising construction materials that have low or negative embodied greenhouse gas emissions and are local and/or sustainably sourced and/or recycled and capable of re-use at the end of a building's life cycle as far as reasonably practicable*

*For change of use proposals, the statement must address how the proposal has considered and integrated measures to increase resilience to future climate change and minimise greenhouse gas emissions such as built fabric efficiency improvement and Low and Zero Carbon Generating Technology.*

*For proposals involving the replacement of existing buildings\* proposals should be accompanied by a carbon assessment setting out the 'whole-life' carbon footprint of the proposed development compared to the option of re-using the existing building to accommodate the proposed use\*\*. Where this comparative assessment fails to show an overall lower carbon footprint then it must be set out why the developer considers the proposal justified, for example because the new development provides additional floorspace and/or dwellings compared to the existing building*

Defence Infrastructure Organisation (0124), University of Edinburgh (0464),  
Watkin Jones Group (0516)

This policy must make allowance for the specific challenges of incorporating mitigation measures when converting listed buildings.

Propose this policy assesses proposals on a case-by-case basis and that sustainability statements can be a way of presenting the best case position for each application. This allows balancing of improved standards and performance, against specific building or servicing requirements, for example for specialist laboratory space, which may dictate that maximum improvements are not achievable.

Crosswind Developments Ltd (0184)

Amend policy to define "detailed proposals" as referenced in the very first sentence of Policy Env 7 Sustainable Developments. This amendment should be included under paragraph 3.98 (Page 103) above the \* the term building to read:

*“Detailed proposals refer to full planning applications. Applications for Planning Permission in Principle will be subject to the use of conditions to ensure matters of sustainability are addressed upon submission of full details.”*

Cramond & Barnton Community Council (0243), Mrs Patricia Stott (0349),  
Jean Morley (0461)

The policy should encourage all family housing of 12 units and more (or all major housing developments) to comprise a specified proportion of homes with integral or attached office space and/or the provision of shared use workspaces.

Kyle Worgan (0272)

Amend criteria a-c to read as follows:

*a. how the proposal integrates measures to both mitigate and futureproof the building against the effects of the climate emergency, particularly with regard to the increased frequency and severity of extreme temperature and storm/rainfall/flooding events as well as sea level rise and erosion, and*

*b. how the proposal incorporates biodiversity within open and built spaces. Biophilic design allows nature and greenery in urban landscapes, where air pollution, health and wellbeing can benefit from features like rooftop gardens, beehives, nest boxes and green walls.*

*c. how the proposal encourages all forms of active travel (including complying with Edinburgh's Street Guidance and associated Factsheets) and shall be accessible by those of all ages and levels of mobility, including those with disabilities.*

Jean Morley (0461)

Indicates that this policy should seek to create hub environments for older communities, have e-charging points, and ensure new build garages are built to a width that can accommodate both modern cars and bicycles

Living Streets Edinburgh Group (0486)

Support if revised as follows:

*"b. how the proposal encourages, incorporates and delivers all forms of active travel (including complying with Edinburgh's Street Guidance and associated Factsheets) in accordance with the order of priority as set out in the transport hierarchy in Scottish Planning Policy and the National Transport Strategy and shall be accessible by those of all ages and levels of mobility, including those with disabilities. "*

Andrew Heald (0566), Leith Harbour and Newhaven Community Council (0776)

It is indicated that the policy should require the greater use of sustainable materials in construction such as timber as an alternative to materials such as concrete. New developments should ensure heating and energy infrastructure is non-gas for all new developments

CoMoUK (0728)

Amend the policy to include a commitment to shared transport.

Edinburgh Napier University (0731)

It is indicated that Policies Env 7 and Policy Env 8 should be updated to include the following:

References to the partnership working to ensure the effective delivery of policy aims.

The importance of 'adaptation' and 'resilience' within the scope of the policies.

Build-in the ability to update policies in future so they can be influenced, adapted and updated .

Development proposals should also be required to demonstrate how they have made a significant attempt to move away from private car reliance and have promoted public transport usage.



'Biodiversity' should be included within the scope of the Policies and that wildlife habitats and water attenuation should not just be referenced in respect of green roofs.

Edinburgh Airport Limited (0761) Proposed wording is as follows:

*"Where achievable and possible detailed proposals involving the construction or change of use of one or more buildings\* must incorporate reasonably practicable measures to address the climate emergency and contribute to sustainable living, with this being demonstrated through a Sustainability Statement which addresses the following:"*

Edinburgh World Heritage (0339)

First paragraph (p103) to be amended as follows:

*"...change of use of one or more buildings or significant redevelopments of existing sites must incorporate..."*

This change is needed to appropriately cover relevant notable-scale site redevelopments which do not constitute a change in use. Such redevelopments may increase existing issues in terms of the impact of climate change/GHG emissions. This proposal can significantly improve the management of climate change risks/increase the reduction of GHG emissions.

Requirements of Sustainability Statement (p103) advised to be amended as follows:

*"For change of use...integrated measures to increase resilience to future climate change (including increased drainage capacity)...Generating Technology. This should demonstrate that this is the most effective and sensitive method of intervention – taking into consideration historic value and available guidance."*

And;

*"For proposals involving the replacement of existing buildings...option of re-using the existing building to accommodate the proposed use. Such proposals should be exceptional and proposals should always prioritise their re-use as the default option, particularly when they are buildings of heritage or townscape value. In these instances, proposals should include an assessment of the heritage significance, contribution to townscape and a carbon assessment based on a robust methodology approved by Historic Environment Scotland...dwellings compared to the existing building. Such proposals would be assessed on their own merits on a case-by-case basis, particularly in the Old and New Towns of Edinburgh World Heritage Site where they should be exceptional and based on robust evidence and rationale."*

This change is needed to ensure that change of use proposals appropriately and effectively respond to the technology and conservation of historic buildings. Also to ensure that drainage is understood as a key issue facing the city.

## **Env 8 – Sustainable Buildings**

Archie Clark (0003), Barratt David Wilson Homes (0677), Wright PDL (0078), Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350),



Homes for Scotland (0404), S Harrison Developments Limited (0460), Ambassador Group (0683), Hazledene House Limited (0695), Steve Loomes (0767), HUB Residential (0582),

It is indicated that this policy should not address carbon emissions reduction.

University of Edinburgh (0464)

The policy should be flexible in terms of green roofs and carbon standards so as to allow large scale key stakeholders in the city such as the University to not have to make the case for relaxations if these are not appropriate for the particular proposal in terms of the site, its location, and its use.

Watkin Jones Group (0516)

The policy should be amended to be flexible so that allowance is made for proposals where it is not possible, feasible or viable to achieve the stated standards.

Summix Capital Limited (0747)

It is indicated that this policy should be deleted or at least apply on a case by case basis

Grange/Prestonfield Community Council (0192)

It is indicated that City Plan should be modified to make clear both Major and Local development must meet Parts A *and* B of the present S1 form and beyond.

Crosswind Developments Ltd (0184)

It must be made clear that this policy will only apply to detailed planning applications. This needs to be made explicit in the supporting text so the policy is not applied wrongly to Planning Permissions in Principle applications. Proposed word changes (Page 104):

*"It is important that new buildings are as sustainable as they can be and play their part in addressing the Climate Emergency. Detailed applications that include new buildings\* will be supported where it has been demonstrated that:*

*a. it has achieved, predominantly through ultra-high fabric energy efficiency, a 'net zero' level of operational greenhouse gas emissions\*\**

*b. surface water run off and water attenuation have been considered where appropriate, green roofs will be supported alongside other measures that would achieve the desired outcomes.*

*c. provision is made for facilities for the separate collection of dry recyclable waste and food waste.*

*The ability to achieve net zero greenhouse gas emissions in line with the requirements above should be evidenced by a statement submitted with applicable applications. It is not the City Council's intention to render development unviable so where concerns arise these must be raised and justified to the satisfaction of the Council. Thereafter compliance will be ensured by attaching a condition to all planning permissions to which this policy applies".*

The supporting text for the policy also needs to state that certain developments (due to their location) will never be able to accommodate green roofs but other water attenuation features would be possible, water butts for example.

John Bremner (0282)

This policy must require proposals meet Passivhaus standard, with no loopholes.

Elgin Haymarket Limited (0292)

This policy should factor in the whole life carbon impact, including the embodied carbon, in relation to the adoption of ultra-high fabric performance and renewable/ low zero carbon measures being promoted (for example a PV array can result in increased embodied carbon in construction which does not payback in terms of the operational carbon it saves).

Additional text is also needed to benchmark/quantify ultra-high fabric energy efficiency in design and construction. This is particularly important should the optimal approach not be achievable.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Barratt David Wilson Homes (0677)

To align with policy Env 7, account for built form/heritage, and make it clear there are no further information requirements, amend the policy text to read as follows:

*It is important that new buildings must be sustainable and play their part in addressing the Climate Emergency. Development that includes new buildings\* will be supported where it has been demonstrated that:*

*a. it has achieved, predominantly through ultra-high fabric energy efficiency, a 'net zero' level of operational greenhouse gas emissions\*\**

*b. where appropriate, green roofs have been provided where new roofs are of a pitch capable of supporting these and that these roofs provide wildlife habitat and water attenuation.*

*c. provision is made for facilities for the separate collection of dry recyclable waste and food waste.*

*The ability to achieve net zero greenhouse gas emissions in line with the requirements above should be evidenced by a Sustainability statement submitted with applications for Planning Permission and Approval of Matters Specified in Conditions. Thereafter this will be ensured by attaching a condition to all planning permissions to which this policy applies.*

*Where new buildings are in particular areas such as a conservation area or are within the setting of listed buildings, the requirement to achieve net zero greenhouse emissions will be exempt.*

Leith Central Community Council (0614)

It is indicated that the policy should be amended to require green roofs proposals to come with a maintenance plan as part of the Planning application.

#### Edinburgh Napier University (0731)

It is indicated that Policies Env 7 and Policy Env 8 should be updated to include the following:

References to the partnership working to ensure the effective delivery of policy aims; as well as the 2030 Climate Strategy as this is a significant document for all development in the city that already promotes collaborative ways of working to address the climate emergency.

The importance of 'adaptation' and 'resilience' within the scope of the policies.

Build-in the ability to update policies in future so they can be influenced, adapted and updated as necessary, as and when new opportunities arise in respect of environmental sustainability, as well as in relation to new legislation coming forward and changes in national expectations.

Development proposals should also be required to demonstrate how they have made a significant attempt to move away from private car reliance and have promoted public transport usage.

'Biodiversity' should be included within the scope of the Policies and that wildlife habitats and water attenuation should not just be referenced in respect of green roofs.

#### Edinburgh Airport Limited (0761)

A number of the requirements may not be achievable across all developments, particularly due to the operational requirements of the airport. Therefore, a disclaimer for these requirements where appropriate should be included in the policy so that it reads as follow:

*"It is important that new buildings are sustainable and play their part in addressing the Climate Emergency. Development that includes new buildings\* will be supported where it has been demonstrated that:*

*a. where appropriate it has achieved, predominantly through ultra-high fabric energy efficiency, a 'net zero' level of operational greenhouse gas emissions\*\**

*b. where appropriate and where this would not impact on airport safeguarding, green roofs have been provided where new roofs are of a pitch capable of supporting these and that these roofs provide wildlife habitat and water attenuation.*

*c. provision is made for facilities for the separate collection of dry recyclable waste and food waste.*

*The ability to achieve net zero greenhouse gas emissions in line with the requirements above should be evidenced by a statement submitted with applicable applications. Thereafter this will be ensured by attaching a condition to all planning permissions to which this policy applies."*

### Cockburn Association (0777)

Provide clearer linkages between this policy and other policies within the plan which support and promote environment, social and economic sustainability.

### **Existing Buildings**

#### Archie Clark (0003), Prof D N Bateman (0004), Juniper Green & Baberton Mains Community Council (0306), Homes for Scotland (0404)

It is indicated that City Plan 2030 should have a policy that addresses improvements for existing building stock.

#### Prof D N Bateman (0004)

Policy should set out how insulation to support heat pumps is to be installed in the current housing stock in areas designated as architecturally or environmentally valuable in heritage terms.

### **Minimum space standards**

#### Cockburn Association (0777)

New policy should be introduced minimum spatial standards and increased outdoor space for well-being and active family environments

### **Glossary associated with this policy**

#### Leith Harbour and Newhaven Community Council (0776)

Ensure use of term greenspace and green roofs and plants are not Astro-turf/plastic.

### **Introduction, Aims and Outcomes**

#### Edinburgh World Heritage (0339)

Amend aim 4 to read:

*“Requiring all new building to have very low embodied carbon and be net-zero...”*

This is needed to appropriately reflect that embodied carbon is of high importance to net-zero alongside operational emissions. It will be critical to ensure alignment of priorities between the City Plan 2030, the future World Heritage Site Management Plan, and the draft 2030 Climate Strategy and its subsequent policies.

2.88 (page 26) could be enhanced by replacing the words ‘energy efficient’ with ‘resilient to the effects of climate change’ as drainage capacity will also be a key consideration.

#### Cockburn Association (0777)

The narrative around growth and operational carbon requirements needs to expand to include embedded carbon and wider sustainability issues.

## Use of Key Terms

### Archie Clark (0003)

References to Climate Emergency should be replaced by references to Climate Change.

It is indicated that terms such as “attractive, biodiverse sustainable drainage system” should be replaced and/or deleted.

‘Sustainable Development’: The definition needs to be revised so that it includes reference to the 13 Principles included in the Scottish Land Use Strategy (‘Getting the best from our land’), especially Principle C which reads: *‘Where land is highly suitable for a primary use (for example food production, flood management, water catchment management and carbon storage) this value should be recognised in decision-making.’*

## Summary of responses (including reasons) by planning authority:

### Env 7 – Sustainable Developments

Elgin Haymarket Limited (0292), Wright PDL (0078), Barratt David Wilson Homes (0677), Wright PDL (0078), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), Steve Loomes (0767)

It has been stated that the requirement for Carbon Assessments is incompatible with the Spatial Strategy as it will preclude brownfield redevelopment and that greater weight needs to be given to other merits of the proposal. The Council disagrees with this for three reasons. Firstly, it is possible some rebuilding proposals could achieve a net positive carbon footprint. Secondly, it may be that some proposals can be delivered without needing to fully demolish existing buildings (e.g. changes of use or simply be proposals that do not contain buildings such as active travel proposals). Finally, Env 7 is clear that carbon assessments for redevelopments will be considered alongside other material considerations, which will allow consideration of how a new proposal may be important for delivery of the spatial strategy. **No modification proposed.**

Leith Central Community Council (0614), Andrew Heald (0566), Cockburn Association (0777)

Some responses are concerned that the weight and consideration that can be given to other matters as part of Env 7 to justify a net negative carbon impact will undermine the importance of carbon assessments. The Council disagrees and notes that a balanced judgement needs to be made in such circumstances. It is well established that decisions on planning application and interpretation of policies will often require balancing of competing considerations, however, the benefit of carbon assessments in this context is that they inform an assessment of the net carbon impact of a proposal that can aid in such a decision. Carbon assessments will also require developers to give greater consideration to achieving best practice in reducing the whole-life carbon footprint of their proposals. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Leith Central Community Council (0614), Archie Clark (0003),

It is stated that further detail is needed on what will be included in carbon assessments, how they are to be undertaken and by whom, as well as how the merits of other aspects of proposals are quantified such as new floor space. The Council considers that Env 7 provides the appropriate level of high-level information on this issue and that it is the role of guidance to set out further details on the methodology to be used for further specifics (e.g. use of established tools and databases to ensure consistent and reliable carbon counting). This also addresses the concern raised over consistency and robustness in carbon assessment submissions. The Council is content it shall be able to assess the information submitted as it is possible for net carbon footprint to be expressed summarily in the form of simple figure(s) in a manner decision makers can understand i.e. the whole life CO2 emissions expressed in terms of weight (TCO2e or KgCO2e). Assessments can provide breakdowns of projected emissions for different parts of a development which may be more complex. However, Carbon Assessments are not necessarily any more prohibitively technical than various other supporting documents that Planning Authorities deal with in connection to planning applications. **No modification proposed.**

Archie Clark (0003), Stewart Milne Homes (0118), Homes for Scotland (0404), Taylor Wimpey (0200), BDW Trading (0350),

It is raised that this is a matter for Building Standards rather than Planning however carbon assessments factoring in construction emissions and embodied carbon are not undertaken as part of the Building Standards process in the way that Env 7 sets out. The Council therefore considers this policy is important in delivering Planning objectives relating to reducing the carbon footprint of new development. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003), Stewart Milne Homes (0118),

The Council is content it shall be able to assess the information submitted. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The Council acknowledges that the approved and adopted NPF 4 will be a material consideration for the Reporter through the Examination. The Council considers that the policy as worded is appropriate. Policy Env 8 already sets out that operational emissions from the building must be net zero, but associated emissions from travel from a building can be projected also and this is what Env 7 addresses. Such whole life assessments should demonstrate that the proposal has achieved the lowest emissions possible. This will include meeting established best practice standards that the Council shall set out in respect of particular aspects of their lifecycle (for example in relation to sourcing of construction materials). Such benchmarking and best practice is an established approach, for example with RIBA CD134 already setting out standards on minimum emissions that should be associated with different components of the construction process. **No modification proposed.**

Andrew Heald (0566)

Introducing a tax on excess carbon emissions arising from development goes beyond locus of what LDPs can do. **No modification proposed.**

Crosswind Developments Ltd (0184), CALA Management Ltd (0465), Hallam Land Management (0599) (0615), Miller Homes Limited (0649), Barratt David Wilson Homes (0677)

Representations seek the policy to be clearer on which applications this policy applies to. The Council considers that the reference to detailed applications is sufficient as it evidently applies to full applications and/or applications for certain matters specified in conditions following on from a grant of planning permission in principle.

Representations also state that City Plan should set out further details on the nature of information needed in sustainability statements in this policy. Some state this should be in the Policy itself, whilst others state it should be set out in Supplementary Guidance. The Council considers Policy Env 7 sets out the key principles in terms of information required. It also intends to bring forward guidance to expand on specific elements. **No modification proposed.**

Defence Infrastructure Organisation (0124), University of Edinburgh (0464), Watkin Jones Group (0516), Edinburgh Airport Limited (0761)

The Council does not agree that the policy should be worded to be applied more flexibly to certain types of proposals, applicants and sites e.g. for Listed Building cases; and that all proposals should be assessed on a case-by-case basis. The Council does not agree the policy should state this since it is for the decision maker to consider and give weight to each material consideration. It is not necessary for every planning policy to reiterate this. **No modification proposed.**

Cramond & Barnton Community Council (0243), Mrs Patricia Stott (0349), Jean Morley (0461), Living Streets Edinburgh Group (0486), CoMoUK (0728)

The Council considers that Policy Env 7 does make provision for flexible use of space in developments, however it would not be enforceable to require spaces within individual planning units such as homes to be used for specific such as multifunctional spaces and home working/workspaces. The Council agrees that 'adaptation' and 'resilience' are important. Including for hub environments for older community, active/shared travel measures, e-charging points and parking for modern cars and bikes within residential developments are addressed in other policies, for example, Inf 1 'Access to Community Facilities'. The Council considers this is provided for to the extent that planning policies can reasonably do so. **No modification proposed.**

Kyle Worgan (0272), Edinburgh Napier University (0731)

The Council notes that the policy does not require to address biodiversity here as this is already addressed in policy Env 37 'Designing-in Positive Effects for Biodiversity'. **No modification proposed.**

Andrew Heald (0566), Leith Harbour and Newhaven Community Council (0776)



The Council considers setting limits on the use of certain materials is unnecessary since the policy already addresses the issue of the sustainability of construction materials. It is not necessary to specifically state new developments shall not utilise gas since Policy Env 8 already requires new buildings to be net zero. **No modification proposed.**

University of Edinburgh (0464), Watkins Jones Group (0516)

The Council disagrees that the effect of this policy would make proposals unviable, either individually or when considered alongside other policy requirements of the Plan. Different combinations of policies apply to different proposals. It is for the decision maker to consider all material considerations for each planning application. **No modification proposed.**

Edinburgh Napier University (0731)

The Council is supportive of partnership working, however, LDPs and their policies are made through a statutory process and cannot under the current legislation be updated outwith this process. This also means the Council cannot 'build-in' the ability to modify proposals at its own discretion in future.

Criterion b) of Env 7 does make provision for encouraging Active Travel. Public transport is a matter which has been considered of sites for inclusion in the Plan rather than something for individual proposals to address.

Whilst adaptation and resilience are key themes relevant to a wide range of proposal types, The Council considers it more concise, useable and effective to set out requirements in a single policy. **No modification proposed.**

Edinburgh World Heritage (0339)

The modification seeking to include redevelopments in the first line of the policy text is unnecessary since this policy text already refers to '*... the construction or change of use of...*'.

The modification seeking reference to increased drainage capacity in the fifth paragraph is unnecessary as this is adequately addressed by the reference to measures to increase resilience. Similarly, the other modification sought to the same paragraph is already adequately covered by a sustainability statement being required to set out how measures were considered. In this context 'considered' should be reasonably understood as including addressing efficacy of the measure and appropriateness to the context.

The proposed modification relating to redevelopments is not agreed as this would effectively give a tilted balance to a judgement on the principle of redevelopment, which the Council does not see as appropriate. The modification making reference to heritage considerations is considered to be adequately addressed in other applicable policies, for example Env 13. **No modification proposed.**

The following representations are supportive of the policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192), Mrs Patricia Stott (0349).



Scottish Wildlife Trust Lothian group (0560), NHS Lothian (0596), Tiger Developments Ltd (0602), Lady Road Investment S.A.R.L. (0625), West Town Edinburgh Ltd (0660), Crosslane Co-Living SPV 2 Limited (0687), Parabola Edinburgh Limited (0723), Southside Community Council (0781)

## **Env 8 – Sustainable Buildings**

Archie Clark (0003), Wright PDL (0078), Summix Capital Limited (0747), Barratt David Wilson Homes (0677), Taylor Wimpey (0200), BDW Trading (0350), Homes for Scotland (0404), S Harrison Developments Limited (0460), Ambassador Group (0683), Hazledene House Limited (0695), Steve Loomes (0767), University of Edinburgh (0464)

The Council disagrees that the requirement for net zero in this policy is unnecessary due to carbon emissions reductions are addressed in Building Standards. The forthcoming changes to Building Standards will not bring new buildings to the standard of full net zero and so this policy is needed to ensure net zero standards.

The Council also disagrees with several elements of the statements that the policy will create conflict, delay, uncertainty, deliverability and viability issues; with greater economies of scale and efficiency if the transition to net zero is rolled out evenly across Scotland. Firstly, it is established that developments should be appropriately tailored to locational context in terms of planning requirements and other spatially specific factors. Secondly, the terms of this policy are clear: it requires net zero. It does not conflict with Building Standards as net zero homes can still attain Building Warrants. The Council recognised that many stakeholders in the construction industry would need to update processes and there would be a level of cost involved. However, the Council does not believe this will render most developments unviable and notes that the Council itself is already moving towards net zero residential and non-residential developments. There are representations which support the policy requirements, including among the development industry (e.g. Tiger Developments Ltd (0602)) which indicate the policy is positive and achievable.

The Council considers there has not been a lack of engagement with the construction and home building industry to determine the extent to which these requirements are deliverable and viable. The policy has been clearly set out in the Main Issues Report CD022 and the Proposed Plan as well as the Council's Draft Climate Strategy CD064. The principles are also being considered more widely, including through the NPF4 consultation stages.

The Council accepts that some new buildings may move to electrical sources of heating and that this has implications for existing grid capacity. The policy encourages the majority of carbon emissions to be reduced through built fabric efficiency to lower energy demand for heating. The plan also promotes heat networks as a heat source to reduce the grid capacity needed for heating purposes. Grid capacity considerations are a focus for Scottish Power in conjunction with the Scottish Government and local authorities. The Council disagrees that the requirement that a 'statement' of intent followed by a planning condition is unworkable as an approach. Given that those implementing the permission may be different from those making the planning application. Planning permissions routinely approve an initial level of detail with conditions requiring more detailed specifications. This is in line with that principle. **No modification proposed.**

Leith Central Community Council (0614)

On retention and maintenance of living roofs the Council would need to treat each case on its own merits. This is not a new matter for planning to address however, with landscaping and living roofs being the subject of planning applications for a considerable time. **No modification proposed.**

University of Edinburgh (0464), Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761), CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Barratt David Wilson Homes (0677), Watkin Jones Group (0516)

The Council does not agree that some new buildings should not be required to meet the full extent standards in this policy, such as those needing to adopt traditional design in terms of materials and detailing or with certain stakeholder requirements. Each application is considered on its own merits, and it is for the decision maker to give weight to the material considerations of the case, including built heritage. **No modification proposed.**

John Bremner (0282)

The Council considers that making the policy stronger in certain ways, for example, requiring Passivhaus standard rather than encouraging it would limit the options a developer had to achieve net zero. For example, net zero heat sources such certain types of heat networks may allow non-Passivhaus dwellings to achieve net zero. **No modification proposed.**

Grange/Prestonfield Community Council (0192), Elgin Haymarket Limited (0292)

The Council does not agree with the request to quantify and benchmark the reference to ultra-high efficiency as the optimal approach to achieving net zero may vary for each proposal.

It is acknowledged that renewable/ low zero carbon measures such as solar panels have an embodied carbon cast as with other construction materials. The S1 form will be updated through due process, with potential to include information on benchmarking standards on matters such as embodied emissions for construction materials.

The Council is still content that solar panels qualify as low and zero carbon technology (LZCT).

The intention of this policy is to provide some flexibility in how new buildings achieve net zero, so it is considered better not to set a target for ultra-high fabric efficiency that must be met in all instances given the level of requirement for this may vary depending on other factors that contribute to achieving of net zero.

Build-in the ability to update policies in future so they can be influenced, adapted and updated as necessary,

Development proposals should also be required to demonstrate how they have made a significant attempt to move away from private car reliance and have promoted public transport usage. **No modification proposed.**

Edinburgh Napier University (0731)

The Council is supportive of partnership working, however, LDPs and their policies are made through a statutory process and cannot under the current legislation be updated outwith this process

Criterion b) of Env 7 makes provision for encouraging Active Travel already. Public transport is a matter which has been considered of sites for inclusion in the Plan rather than something for individual proposals to address.

Whilst adaptation and resilience are key themes relevant to a wide range of proposal types, The Council considers it more concise, useable and effective to set out requirements in a single policy.

The Council notes that the policy does not require to address biodiversity here as this is already addressed in policy Env 37 'Designing-in Positive Effects for Biodiversity'. **No modification proposed.**

University of Edinburgh (0464), Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

In response to concerns about the long-term viability of living roofs and the operational, financial and maintenance challenges of them, the Council notes they are capable of long-term maintenance at a reasonable cost provided an appropriate management plan is in place and adhered to. It is noted that the airport has raised specific issues regarding safety and living roofs however these would be addressed with reference to specific proposals and planning applications rather than tailoring this city-wide subject policy given that the solution to such issues may be more nuanced depending on the specific proposal context. **No modification proposed.**

Leith Central Community Council (0614)

The supporting text for Policy Env 27 addresses the need for landscaping and maintenance arrangements and this policy is covered as part of Issue 11: Design and Placemaking. **No modification proposed.**

Cockburn Association (0777)

In terms of clarification of the linkages between this policy and others the Council notes that page 40 sets out the overall structure of this policy section, with the Design and Environment policies grouped together for ease of reference given the overlap between these. Within this section however there are also sub-headings e.g., Existing Natural Environment Policies, which can help understand links between policies. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council agrees that measures such as green roofs as referred to in criterion b) require assessment of their context, including in respect of built heritage. Criterion b) is prefixed with the wording 'Where appropriate' to address this.

The supporting text for this policy also sets out that the Council will bring forward guidance to address how green roofs are considered in respect of built heritage amongst other issues.

Aside from criterion b) the Council does not consider the other provisions of this policy need caveats on built heritage given the other Plan policies on heritage designations and assets. **No modification proposed.**

The following representations are supportive of the policy as proposed:

SEPA (0012), Richard Marsh (0165), Scottish Wildlife Trust Lothian group (0560), NHS Lothian (0596), Aviva Life and Pensions UK Limited (0598), Tiger Developments Ltd (0602), Lady Road Investment S.A.R.L. (0625), RSPB (0648), Parabola Edinburgh Limited (0723),

### **Existing Buildings**

Archie Clark (0003), Prof D N Bateman (0004), Juniper Green & Baberton Mains Community Council (0306), Homes for Scotland (0404)

Issues relating to the existing building stock are important to the City's aim to reach net zero by 2030. Plan policies can address this in some instances where development is proposed to a building, The considerations of existing building stock and retrofitting requirements are not planning policy matters and are addressed in the Council's draft 2030 Climate Strategy. **No modification proposed.**

Crosswind Developments Ltd (0184)

On the suggestion that it be made clear that this policy will only apply to detailed planning applications the Council agrees that many aspects of this policy relate to detailed matters that could not be assessed at the stage of applications for planning permission in principle (PPP). However, the policy wording would still be required to ensure appropriate condition(s) are attached to a PPP to ensure the matters were addressed in subsequent detailed applications. **No modification proposed.**

### **Minimum space standards policy**

Cockburn Association (0777)

City Plan has policies relating to minimum open space standards (Env 31 and Env 32), with Hou 3 addressing the need for a range of house types and sizes. This is supported by the Edinburgh Design Guidance. **No modification proposed.**

### **Glossary associated with this policy**

Leith Harbour and Newhaven Community Council (0776)

This representation sought to ensure use of term greenspace and green roofs and plants are not Astro-turf/plastic. This is a detailed design matter, and it is considered sufficiently clear that artificial materials are not a green space or green roof. **No modification**

**proposed.**

## **Introduction, Aims and Outcomes**

Edinburgh World Heritage (0339), Cockburn Association (0777)

Expanding reference to carbon assessments in the Aims as proposed is not in line with Policy Env 7 as currently proposed in the Plan, as embodied carbon is considered in respect of redevelopments but not *all* new builds. As such Aim 4 should be left as proposed.

The Council considers climate resilience and energy efficiency to be two related but distinct matters. As such it does not agree that a reference to resilience should replace the reference to energy efficiency.

The Council is satisfied that overall embedded carbon and wider sustainability issues are adequately addressed in the Introduction and Aims. **No modification proposed.**

## **Use of Key Terms**

Archie Clark (0003)

The use of the term Climate Emergency is appropriate as it reflects the urgency of actions required to address it.

The Council considers the terms used in the example to be sufficiently clear in their meaning, however the glossary of City Plan provides definitions of biodiversity and sustainable urban drainage to provide further clarification if required.

The Council does agree with expanding the definition of Sustainable Development as proposed as this would make it overly long and complex and dilute how directly applicable it could be to such a wide range of contexts – with that being a key matter for such a term such as this. **No modification proposed.**

## **Reporter's conclusions:**

## **Reporter's recommendations:**

<b>Issue 14</b>	<b>Historic Environment policies</b>			
<b>Development plan reference:</b>	Policies Env 9 to Env 17	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="0"> <tr> <td> Anna Brand (0742)  Archie Clark (0003)  AREAA (0358)  Cockburn Association (0777)  Cramond &amp; Barnton Community Council (0243)  Crosswind Developments Ltd (0184)  Edinburgh World Heritage (0339)  Grange/Prestonfield Community Council (0192)  Hallam Land Management (0615) </td> <td> James Forbes (0647)  Juniper Green &amp; Baberton Mains Community Council (0306)  Leith Harbour and Newhaven Community Council (0776)  Melford Developments Ltd (0308)  Neil Ross (0610)  RSPB (0648)  SEPA (0012),  West End Community Council (0692) </td> </tr> </table>			Anna Brand (0742) Archie Clark (0003) AREAA (0358) Cockburn Association (0777) Cramond & Barnton Community Council (0243) Crosswind Developments Ltd (0184) Edinburgh World Heritage (0339) Grange/Prestonfield Community Council (0192) Hallam Land Management (0615)	James Forbes (0647) Juniper Green & Baberton Mains Community Council (0306) Leith Harbour and Newhaven Community Council (0776) Melford Developments Ltd (0308) Neil Ross (0610) RSPB (0648) SEPA (0012), West End Community Council (0692)
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<b>Provision of the development plan to which the issue relates:</b>	Policies relating primarily to the Historic Environment and heritage designations and strategy			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>Introduction and general comments on historic environment policies</b></p> <p><u>Edinburgh World Heritage (0339)</u></p> <p>There is inadequate reference to historic environment protection legislation, policies and strategies. It should also acknowledge the nuanced challenge for heritage posed by new requirements for green blue Infrastructure, climate change adaptation, energy efficiency and renewable/low carbon heat generation technologies. The Plan needs to better address the bespoke manner that these must be addressed for the historic environment – particularly within the ONTE World Heritage Site.</p> <p>As with any positive change management in the historic environment, this should be informed by the following outline process:</p> <ol style="list-style-type: none"> <li>1) Understand the Outstanding Universal Values and/or special interest affected through the early production of a Heritage Assessment or equivalent document</li> <li>2) Consider a range of options that are relevant to the World Heritage Sites context</li> <li>3) Assess and refine options with a core criteria being the extent to which Outstanding Universal Values and/or special interest is conserved or enhanced</li> </ol> <p><b>Env 9 - World Heritage Sites</b></p> <p><u>Edinburgh World Heritage (0339)</u></p> <p>This policy and supporting text does not fully address the following:</p>				

- Impact on intangible cultural heritage (for example; communities and traditions which are highly important to culture as well sustainable physical conservation)
- Proactive support is as important to sustaining World Heritage Sites as avoiding harm
- The key contributing features beyond buildings to include 'spaces and features'
- The reference to setting is not wholly appropriate

The World Heritage Site policy has moved from ENV 1 in the adopted LDP to ENV 9 in City Plan. It should be moved back upward to a similar numbering position in order to reflect the hierarchy of legislative protection and policy – international, national, local etc.

Greater clarity is needed in various parts of this policy and supporting text.

This policy does not have an adequately tailored approach to the climate emergency solutions which is cognisant of the unique characteristics of the Outstanding Universal value of the Old and New Towns of Edinburgh World Heritage Site. The cumulative and detrimental impact of interventions such as green roofs needs to be carefully considered.

## **Env 10 – Listed Buildings Demolition**

### Edinburgh World Heritage (0339)

Bullet three needs to balance a loss of heritage (a loss of public benefit) against a weighing of other public benefits

Bullet four is too open-ended and would potentially result in unjustified loss out of step with legislation and policy.

### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The conditions allowing demolition cause concern.

The justification criterion 'c' is especially subjective, especially given the reference to 'significant' benefits.

### Melford Developments Ltd (0308)

This policy needs to differentiate between type and/or category of listed building, or where there is partial listing.

CEC should make publicly available online the specifics of each listing, in particular the specific physical elements that are covered by each listing, as required by HES.

### Cockburn Association (0777)

When demolition takes place then the re-use of materials should be required.

## **Env 12 – Listed Buildings - Alterations and Extensions**



Anna Brand (0742)

This policy does not adequately address the issue of energy efficiency and the transition to net zero.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The policy should be modified.

Cockburn Association (0777)

Propose an additional statement suggesting that subdivision of listed buildings will only be permitted if it does not affect its historic significance and layout.

Subdivision of properties returning to housing from other uses should only be permitted in circumstances where the building has already been subdivided or in circumstances where previous alterations mitigate against retention of the existing floor plans or arrangements.

### **Env 13 – Conservation Areas – Demolition of Buildings**

Melford Developments Ltd (0308)

Object to policy as the Conservation Area Character Assessments have not been updated as part of the LDP. Many Conservation Areas have had significant change since their CACAs have been developed.

The presumption in favour of retention is contrary to sustainable buildings policies within the LDP. Many old buildings in CAs are particularly unsustainable.

Cockburn Association (0777)

This policy is now weaker as it no longer applies the stronger level of protection afforded by policy on Listed Building Demolition. This added clarity to the policy and grounds the assessment in national policy.

### **Env 14 - Conservation Areas – Development**

Edinburgh World Heritage (0339)

The policy must better protect against development that changes the way the historic streetscape can be read by understanding the site and context.

It also does not fully promote well-planned sites and well-designed use of appropriate materials can be used to reinforce the historic character, hierarchy and street patterns.

Historic public realm surfaces are important contributors to the historic character of an area. The way in which materials are used, planting style and type are also a characteristic to be preserved in an historic area.

Neil Ross (0610), Anna Brand (0742)



This policy does not adequately address the issue of energy efficiency and the transition to net zero, particularly in respect of replacement of windows and the incorporation of double or triple glazing.

James Forbes (0647)

This policy does not adequately protect of Conservation Areas from gradual erosion of their essential character as a result of one bad development serving as precedent for others.

West End Community Council (0692)

There is too little protection of Conservation Areas (and their surrounds) from development with little or regard for the historic context. There is a particular problem with modernist development that seeks to actively contrast with the heritage. This is evidenced in various recent developments being permitted which have been unsympathetic.

AREAA (0358)

In the context of a spatial strategy it is inevitable that the existing built fabric will be subject to greater pressure for change, including land within or near conservation areas. Due regard must be given both to protecting and enhancing conservation areas and to realising the overall spatial strategy.

Where conflict between these two aims arises, there needs to be balance so that adverse impact is mitigated and/or compensated. If the loss or impact upon of a feature within a conservation area can be offset through other improvements, or on planning balance the loss or impact is outweighed by other benefits, then the policy should be suitably flexible to respond to those scenarios

**Env 15 – Historic Gardens and Designed Landscapes**

Crosswind Developments Ltd (0184), AREAA (0358)

This policy is overly restrictive in its current form.

The policy is not sufficiently precise in relation to ‘non-designated sites’. No list of these is provided, nor is any definition given.

Edinburgh World Heritage (0339)

This policy does not appropriately protect and enhance the Outstanding Universal of the Old and New Towns of Edinburgh World Heritage Site.

The terminology relating to designated landscapes is not streamlined and wording needs to be clarified, for example not all elements of current ‘character’ will be positive.

Graveyards are important historic sites that are at risk of being overlooked as they are places with layers of considerable heritage interest worthy of conservation.

Reference could also be made to Edinburgh World Heritage's "Care and Conservation of Shared Georgian Gardens".

#### Hallam Land Management (0615)

The proposed policy does not promote and recognise the restoration of historic and designated landscapes as part of complementary development proposals.

### **Env 17 - Development of Sites of Archaeological Significance**

#### Cramond & Barnton Community Council (0243)

The policy does not make adequate provision to prevent speculative developer excavating archaeological investigation trenches prior to seeking planning consent, especially when this ground is not reinstated. It is indicated this taken place already and without discouragement there is a risk of this occurring across various potential development sites around the City.

### **Proposal map Heritage designations**

#### Crosswind Developments Ltd (0184)

Various heritage designations (Env 9, Env 10, Env 12, Env 14) stated as relating to Crosswinds site however these are not applicable.

### **Modifications sought by those submitting representations:**

#### **Introduction and general comments on historic environment policies**

#### Edinburgh World Heritage (0339)

Add a dedicated aim for the historic environment as follows:

*"Actively conserving and enhancing Edinburgh's World Heritage Sites and wide range of heritage assets for the cultural, social, environmental and economic benefits they bring."*

This is needed as the World Heritage Site and historic environment generally are vitally important to Edinburgh – as a fundamental cultural asset, as well as a vital economic contributor of great wellbeing and social benefit. It does not look after itself, and requires carefully integrated policies and proactive action to maintain and protect this irreplaceable asset. The conservation and enhancement of the historic environment must therefore be a key aim of the Plan.

Page 11/12 add reference to and proportionate description of:

- The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and other relevant historic environment legislation
- The Historic Environment Policy for Scotland (Historic Environment Scotland)

Page 13 add reference to and proportionate description of:

## The Old and New Towns of Edinburgh World Heritage Site Management Plan

Add an additional bullet to 2.62 as follows:

- Protecting the intrinsic heritage values and assets of green and blue network of the Old and New Towns of Edinburgh World Heritage Site and other designated heritage assets

### Env 9 – World Heritage Sites

#### Edinburgh World Heritage (0339)

Suggested rephrasing of policy and supporting text as follows:

“Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and/or the Forth Bridge as World Heritage Sites or would have a detrimental impact on a Site’s setting or intangible cultural heritage will not be permitted. Opportunities to proactively support or enhance these qualities should be demonstrably sought.”

“This policy requires development to respect, protect and where possible enhance the Outstanding Universal Value of each World Heritage Site and its setting. The Statement of Outstanding Universal Value for World Heritage Sites provides the summary for why a Site is considered to be of international importance and should be used to establish a baseline for assessing development.”

“This policy also requires the protection of key characteristics of buildings, public realm, green infrastructure and features which contribute to Outstanding Universal Value. Community resilience and engagement should also be supported as an important contributor to both tangible and intangible cultural heritage. Setting may include sites in the immediate vicinity and viewpoints identified in the key views study as well as other views to and from the World Heritage Sites that make a positive contribution to their value, understanding or appreciation.”

“The Management Plans for the Forth Bridge and Old and New Towns of Edinburgh World Heritage Sites should be used as an active tool in developing proposals; as should Historic Environment Scotland’s Managing Change Guidance on World Heritage.”

Add a new paragraph as follows:

“A specific approach, sympathetic to the character of the Old and New Towns of Edinburgh World Heritage Site, must be implemented when considering additional green blue network infrastructure, interventions in the public realm or in buildings to facilitate the transition to net zero, cut GHG emissions or to adapt to the impact of climate change. Solutions that may be valid in other parts of the city may not be appropriate in the context of the World Heritage Site, and specific solutions may be required. Each proposal should be informed after having followed a process of understanding the heritage significance of the targeted area supported by appropriate research and run a Heritage Impact Assessment to mitigate any impact on the Outstanding Universal Value of the World Heritage Site. Proposals will be reviewed on their own merits on a case-by-case basis.

This also applies to the general setting of Edinburgh, including the Green Belt, Firth of Forth and Pentland Hills, when considering new development such as wind turbines or any renewable/low carbon heat generation technologies that could have a detrimental impact on the views from the World Heritage Site.”

Leith Harbour and Newhaven Community Council (0776)

The protection afforded by this policy should apply to all Listed Buildings and Conservation Area.

Cockburn Association (0777)

The Management Plans for the Forth Bridge and the Old and New Towns of Edinburgh World Heritage Site must be referred to for further supporting information; as should Historic Environment Scotland Managing Change Guidance on World Heritage.

**Env 10 – Listed Buildings - Demolition**

Edinburgh World Heritage (0339)

Bullet three requires amendment as follows:

- “...the demolition of the building is essential to delivering public benefits which outweigh the irreversible loss of heritage and demonstrably could not otherwise be achieved.”

Bullet four requires removal and replacement with the following text:

- “The building is demonstrably incapable of viable use or repurposing, including seeking grant funding and appropriate marketing.”

We advise that 3.110 is amended to read:

“...Applications to demolish listed buildings or other buildings of heritage or streetscape value will be refused unless...”

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

No specific modifications stated however it is indicated that the criteria potentially justifying demolition should be strengthened to reduce scope for demolition.

Criterion ‘c’ should provide clarity around what level of community or economic benefit would be considered significant.

Melford Developments Ltd (0308)

This policy needs to differentiate between type and/or category of listed building, or where there is partial listing.

Cockburn Association (0777)

The policy should state that when demolition takes place then the re-use of materials should be required.

## **Env 12 – Listed Buildings Alterations and Extensions**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

“And” should be added to the first bullet point requirement to emphasise that *all* three conditions must be met.

Anna Brand (0742)

Greater allowance should be afforded to alterations where these would contribute to the transition to net zero and energy efficiency.

Cockburn Association (0777)

Propose an additional statement suggesting that subdivision of listed buildings will only be permitted if it does not affect its historic significance and layout.

## **Env 13 – Conservation Areas – Demolition of Buildings**

Melford Developments Ltd (0308)

This policy should be less restrictive on development.

Cockburn Association (0777)

The current LDP policy should be retained.

## **Env 14 - Conservation Areas – Development**

Edinburgh World Heritage (0339)

Amend bullet two to read:

*“...preserve trees, hedges, boundary walls, railings, paving, setts and other features...”*

Amend bullet three to read:

*“...design and utilises matching or complimentary materials and planting in a manner appropriate to the specific character of the local historic environment...”*

AREAA (0358)

Amend policy ENV 14 (P107) to include additional sentence after criteria a – c, reading:

*“Where any of the features and qualities referenced above would be affected by proposed development any adverse impact will require to be mitigated either through other positive impacts arising from the development or the development proposals meeting an identified need which would offset the loss or adverse impact.”*

Anna Brand (0742)

Greater allowance should be afforded to alterations where these would contribute to the transition to net zero and energy efficiency.

Neil Ross (0610)

Some flexibility must be introduced into Part C of Env 14 to allow the use of modern materials that are equivalent in appearance to the original and therefore comply with Part A to preserve or enhance the special character and appearance of the conservation area.

James Forbes (0647)

The original Character Appraisal, which defines why a CA was established in the first place, should be the guide, not some degraded version. This means sticking more strictly to the requirement that any development "preserves or enhances the special character" of the Conservation Area.

West End Community Council (0692)

There should be an acknowledged border zone around every conservation area, in which all development must respect and not impair the nature and character of such conservation area.

There needs to be given to a definition of "quality" and its arbiters. The same goes for "development principles".

The policy should give local residents a veto.

**Env 15 – Historic Gardens and Designed Landscapes**

Edinburgh World Heritage (0339)

Amend main policy wording to read:

*"Development will only be permitted where there is no detrimental impact on the special interest and historic character...Designed Landscapes as well as non-designated sites. This includes historic graveyards and burial grounds. There must be no adverse...and always be minimised. Care should be taken to understand the historic interest and management of historic gardens and their planting style. Restoration..."*

Add new paragraph after 3.121 (or alternatively in ENV 16):

*Historic graveyards and burial grounds and their settings should be protected and enhanced where possible by development of adjacent sites. The significance of the graveyard should be understood before planning any development. Development within a graveyard should only be undertaken in accordance with a Conservation Management Plan and should recognise and preserve the burial ground's unique character and cultural landscape.*

Crosswind Developments Ltd (0184), AREAA (0358)

Amend policy wording to read as follows:

*“Development will only be permitted where there is no significant detrimental impact on the character of a site recorded in the Inventory of Gardens and Designed Landscapes as well as non-designated sites. There must be no significant adverse effects upon their setting or upon component features which contribute to their value. Elsewhere, adverse effects on historic landscape character and features should be avoided wherever possible, and always be minimised. Restoration and enhancement of these historic landscapes is actively encouraged”.*

The representations also indicate that a definition and/or list should be provided on what constitutes a ‘non-designated site’

Hallam Land Management (0615)

Add at the last policy sentence ‘...*Restoration and enhancement of these historic landscapes is actively encouraged as part of a comprehensive planning proposal*’

## **Env 17 – Development of Sites of Archaeological Significance**

Cramond & Barnton Community Council (0243)

This policy should include an additional element requiring developers/ landowners to reinstate land disturbed by archaeological survey excavations within a fixed period, unless a planning application is under consideration, or consent has been granted for development

## **Proposal map heritage designations**

Crosswind Developments Ltd (0184)

Remove various heritage designations (Env 9, Env 10, Env 12, Env 14) stated as relating to Crosswinds site

## **Summary of responses (including reasons) by planning authority:**

### **Introduction and general comments on historic environment policies**

Edinburgh World Heritage (0339)

As existing features, it is the designations and relevant policies which deliver protection and enhancement of the World Heritage Sites and historic environment given the importance of detail in this regard. By comparison, the aims section is primarily higher level objective setting.

The Council considers that paragraph 2.48 addresses the Old and New Towns of Edinburgh World Heritage Site Management Plan CD133. No modification necessary, however, should the Reporter see merit in additional clarity the Council would not object to the additional references suggested.

The Council considers that these are considerations which arise where such developments are pursued and of its statutory duty to ensure developments preserve or enhance the relevant heritage assets and designations. It would not be appropriate to include policy or related wording which undermines that duty. It is for the decision maker to consider the effects of development on heritage assets in that context.

The process for considering such change as set out in the representation is very specific and methodological, with its essence captured in the higher level Plan text. As such it is considered more appropriate for guidance to address rather than Strategy text.

It is considered the change proposed following paragraph 2.62 is covered in more general terms already by bullet point five that follows that paragraph.

## **Env 9 - World Heritage Sites**

### Edinburgh World Heritage (0339)

The Council recognises there is a connection between communities and built heritage however planning can only address issues relating to the development of land.

Proactive support is indeed important to World Heritage Sites however subject policies such as this one are needed in order to assess applications for development and need to be worded for this purpose.

The Council is not clear why the representor feels the reference to setting is not wholly appropriate. The proposed policy text from the representor appears to retain the reference to setting.

This policy was numerically first in historic environment policies section of the adopted LDP CD039, however these historic environment policies have been combined into a consolidated environment policies section. Although this means the policy is no longer the first numerically, this has no bearing on its weight or status relative to other policies.

The Council is content with the policy and supporting text as proposed so no modification is proposed, however, should the Reporter be so minded the Council has no issue with a modification proposed to the final supporting text paragraph highlight the role the Management Plans to be used as a tool for developing proposals.

The paragraph proposed regarding green and blue infrastructure is not considered necessary as the Council intends to bring forward guidance which addresses this issue.

### Leith Harbour and Newhaven Community Council (0776)

The World Heritage Sites (WHS) have a greater status and sensitivity than Conservation Areas so it is considered appropriate that Policy Env 9 sets out more specific requirements. Listed Buildings within the Site can be assessed under both policy designations where applicable. Outwith the WHS it would not be appropriate to use its policy provisions in listed building cases. This could undermine the particular purpose of the WHS designation. **No modification proposed.**

### Cockburn Association (0777)



These documents are referred to in paragraph 3.106. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192)

### **Env 10 - Listed Buildings - Demolition**

Edinburgh World Heritage (0339)

This policy has been formulated in line with appropriate Historic Environment Scotland guidance on 'Managing Change in the Historic Environment: Demolition of Listed Buildings' CD131. The third bullet point in Env 10 reflects the weight to be given to economic growth or wider community as set out in page 8 of the guidance.

The guidance provides further detail however, it does not set out a reference to the loss of heritage. The Council considers the overall purpose of a policy presumption against demolition is to capture that these buildings have significant heritage value.

Criterion d) is acceptable as it stands given that the supporting text makes cross reference to guidance providing adequate detail on what measures are needed to demonstrate compliance.

The Council is satisfied with the content of this supporting text paragraph (marked with an asterisk) and so no modification is proposed however should the Reporter be so minded the Council has no issue for the purposes of clarity in a modification so that it becomes a numbered paragraph instead of being specifically linked to the fourth bullet point via the asterisk.

The Council does not agree with the proposed amendment to paragraph 3.110. The purpose of this policy is to apply to listed buildings; not buildings with heritage/streetscape value.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Council is content that criterion c. is not too subjective given that the cross reference to the managing change guidance above gives the threshold for compliance with the criterion. **No modification proposed.**

Melford Developments Ltd (0308)

The Council understands there may be greater value in A Listed buildings, compared to lesser designations however the principle of demolishing any listed building still has potentially significant impact and needs to be fully justified. Policy has been worded as intended to apply to all listed buildings. Where part of a site is listed the decision maker can apply the policy accordingly being aware of the material considerations of the case.

Information on each listing is publicly available through Historic Environment Scotland. Legislation is clear on the entirety of a Listed Building being protected CD107. It would be

incorrect of the Council to give the impression that it is only the features noted in the Listing description as being listed. **No modification proposed.**

Cockburn Association (0777)

The re-use of materials for all buildings demolished is encouraged, with this covering Listed Buildings also. This is addressed in Policy Env 7 and discussed further in Issue 13: Sustainable Design. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192)

**Env 11 - Listed Buildings - Setting**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192), AREAA (0358), Cockburn Association (0777)

**Env 12 – Listed Buildings – Alterations and Extensions**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Council is content that the policy as proposed with ‘and’ at the end of the penultimate bullet point makes clear that all the preceding bullet points needs to be met to ensure compliance. **No modification proposed.**

Anna Brand (0742)

This policy itself is principally about assessing impact on the listed buildings. If the decision maker wishes to afford positive weight to a proposal due to its contribution toward energy efficiency or other matters then they can set this out in their decision-making process as part of their overall, balanced assessment. For proposals of a scale relating to the construction or change of use of one or more building then such positive weighting can be directly considered as part of Policy Env 7 – Sustainable Developments (see Issue 13: Sustainable Design). **No modification proposed.**

Cockburn Association (0777)

The Council does not consider it necessary to make provision for how this specific type of proposal would be considered as the policy provides an adequate framework a decision maker’s consideration. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192)

**Env 13 – Conservation Areas – Demolition of Buildings**

Cockburn Association (0777)

The update to this policy to move away from the demolition criteria relating to Listed Buildings reflects the corresponding evolution in approach set out by Historic Environment Scotland in its 'Interim Guidance on the Designation of Conservation Areas and Conservation Area Consent.' CD132. **No modification proposed.**

Melford Developments Ltd (0308)

Conservation Area Character Assessments are reviewed on an ongoing basis. The Council still considers these Appraisals remain fit for purpose as assessment of the core character of each area.

The presumption in favour of retention is not inherently contrary to Policy Env 8. Env 8 sets out requirements relating to new buildings. It does not set out that new buildings will always be a more sustainable option than retention. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192)

**Env 14 - Conservation Areas – Development**

Edinburgh World Heritage (0339)

The Council is content that the wording of the policy achieves the overall effect sought in representation, with the decision maker able to apply their judgement on what the specific local character is in the context in question. **No modification proposed.**

AREAA (0358)

The approach that adverse impact can be accepted if it is mitigated would undermine the aims of the policy for preserving the character of Conservation Areas. The Council is not persuaded that mitigation of adverse impact is a successful approach for built heritage. It could be held to undermine the Council's statutory duty to preserve or enhance a Conservation Area. **No modification proposed.**

Neil Ross (0610), Anna Brand (0742)

This policy itself is for assessing impact on a Conservation Area. It is for a decision maker to give weight the relevant policies including energy efficiency or other relevant matters as part of their assessment. For proposals of a scale relating to the construction or change of use of one or more building then such positive weighting can be directly considered as part of Policy Env 7 – Sustainable Developments (see Issue 13: Sustainable Design). **No modification proposed.**

James Forbes (0647)

Paragraph 3.119 includes for the need to refer to the relevant Character Appraisal and how this has informed proposals. This should ensure more faithful adherence to the unique qualities of the area rather than more generic qualities or detrimental aspects within the area. **No modification proposed.**

#### West End Community Council (0692)

Some points raised relate to interpretation of current LDP policy rather than the proposed Plan policy. That is not for the Schedule 4 process to address.

The policy does permit consideration of proposals outwith conservation areas. The policy refers to where proposals may affect its setting.

It is not for LDP policy to provide a veto to residents. That would require new legislation

The assessment of quality is for the decision maker on any given application. An assessment will reflect the material considerations of the case.

Development principles relate to the matters which should be considered when formulating a development proposal. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192), RSPB (0648),  
Cockburn Association (0777)

#### **Env 15 - Historic Gardens and Designed Landscapes**

Crosswind Developments Ltd (0184), AREAA (0358)

This policy is appropriate to manage development proposals that may affect any historic garden, designed landscape or more general historic landscape feature, including those not formally designated. It is for the decision maker to assess what may be considered historic as not all of value have inventory status. The Council considers it appropriate to recognise the value that landscapes, natural and man-made, can make to an area's character and heritage. The policy as proposed reflects this and is not considered too restrictive in light of this objective. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council is content that the wording of Env 15 achieves the overall objectives for Historic Gardens and Designed Landscapes. No modification is therefore proposed, however, should the Reporter these merit in the representation adding the word 'special' prior to interest and historic character this could add clarity and consistency with accepted terminology.

The additional reference to graveyards and burial grounds is adequately covered by the policy itself. The same view is taken on the final sentence the representation proposes to add to the policy text itself and the reference to the document titled "Care and Conservation of Shared Georgian Gardens. **No modification proposed.**

Hallam Land Management (0615)

Proposals that would restore and enhance historic landscapes would be compliant with the policy therefore the addition is not required. It is for a decision maker to afford give weight to policies in assessing a proposal. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192), SEPA (0012), Cockburn Association (0777)

#### **Env 16 - Protection of Important Archaeological remains and the historic environment**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192), Cockburn Association (0777)

#### **Env 17 - Development of Sites of Archaeological Significance**

Cramond & Barnton Community Council (0243)

City Plan cannot introduce control over when excavation requires consent (and by association that reinstatement should take place) as this is instead set out by legislation. In particular the Town and Country Planning Act CD101 (in respect of the 'Meaning of development'). In certain circumstances Scheduled Monument Consent may also apply. **No modification proposed.**

The following representations have been made in support of the policy as proposed:

Grange/Prestonfield Community Council (0192)

#### **Proposals Map Heritage designations**

Crosswind Developments Ltd (0184)

These designations are not specific to the Crosswinds site but are shown in the proposals map as potentially applying to locations across the Council area given the potential for development to affect their setting. It is for the decision maker to assess whether the policy applies in each case. **No modification proposed.**

#### **Reporter's conclusions:**

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#### **Reporter's recommendations:**

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<b>Issue 15</b>	<b>Natural Environment policies</b>			
<b>Development plan reference:</b>	Policies Env 18 - 22, Env 37	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Archie Clark (0003)  AREAA (0358)  Barratt David Wilson Homes (0677)  BDW Trading (0350)  Cala Management Ltd (0465)  Craigleith-Blackhall Community Council (0403)  Cramond &amp; Barnton Community Council (0243)  Crosswind Development Ltd (0184)  Dandara East Scotland (0757)  Dr Tim Duffy (0503)  Edinburgh Airport Limited (0761)  Edinburgh World Heritage (0339)  Esk Property LLP (0726)  Friends of the Pentland Hills (0787)  George Kelsey (0386)  Grange/Prestonfield Community Council (0192)  Hallam Land Management (0599) (0615)  Hillside Leisure Ltd (0080)  Homes for Scotland (0404)  James Forbes (0647)  John Martin (0008)  Juniper Green and Baberton Mains Community Council (0306) </td> <td> Kathryn Poolman (0574)  Leith Central Community Council (0614),  Leith Harbour and Newhaven Community Council (0776)  Melford Development Ltd (0308)  Miller Homes Limited (0469)  Mr T Klan (0307)  NatureScot (0528)  Neil Watt (0439)  Richard Doake (0436)  Richard Graveling (0135)  RSPB (0648)  Scottish Government - Planning and Architecture Division - Development Plans Team (0309)  Scottish Wildlife Trust Lothian Group (0560)  SEPA (0012)  Steve Loomes (0767)  Stewart Milne Homes (0118)  Stirling Developments Limited (0303)  Tarmac (0244)  Taylor Wimpey (0200)  The Association for the Protection of Rural Scotland (0334)  The Woodland Trust (0774)  William Mason (0438)  Wright PDL (0078) </td> </tr> </table>			Archie Clark (0003) AREAA (0358) Barratt David Wilson Homes (0677) BDW Trading (0350) Cala Management Ltd (0465) Craigleith-Blackhall Community Council (0403) Cramond & Barnton Community Council (0243) Crosswind Development Ltd (0184) Dandara East Scotland (0757) Dr Tim Duffy (0503) Edinburgh Airport Limited (0761) Edinburgh World Heritage (0339) Esk Property LLP (0726) Friends of the Pentland Hills (0787) George Kelsey (0386) Grange/Prestonfield Community Council (0192) Hallam Land Management (0599) (0615) Hillside Leisure Ltd (0080) Homes for Scotland (0404) James Forbes (0647) John Martin (0008) Juniper Green and Baberton Mains Community Council (0306)	Kathryn Poolman (0574) Leith Central Community Council (0614), Leith Harbour and Newhaven Community Council (0776) Melford Development Ltd (0308) Miller Homes Limited (0469) Mr T Klan (0307) NatureScot (0528) Neil Watt (0439) Richard Doake (0436) Richard Graveling (0135) RSPB (0648) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) Scottish Wildlife Trust Lothian Group (0560) SEPA (0012) Steve Loomes (0767) Stewart Milne Homes (0118) Stirling Developments Limited (0303) Tarmac (0244) Taylor Wimpey (0200) The Association for the Protection of Rural Scotland (0334) The Woodland Trust (0774) William Mason (0438) Wright PDL (0078)
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<b>Provision of the development plan to which the issue relates:</b>	Policies relating primarily to the protection of the existing Natural Environment			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>Env 18: Development in the Green Belt and Countryside</b></p> <p><u>Archie Clark (0003), Juniper Green and Baberton Mains Community Council (0306), Scottish Government - Planning and Architecture Division - Development Plans Team (0309)</u></p> <p>This policy takes no account of the importance of land for food production. The need for food security is increasing need for food security and soil fertility is diminishing.</p>				

This policy takes no account of the amenity value to the community.

Development of brownfield land should be encouraged more strongly.

This policy and plan does not address the requirements of SPP para. 80 which sets out that development should not be permitted except where essential and in a limited range of circumstances. Draft NPF4 policy no Rural places 31 (h) provides proposed circumstances for when development may be supported on such land.

The plan area does include some peri urban/accessible rural areas, which could include Prime agricultural land or land of lesser quality that is locally important. This should be considered and included as relevant in the plan.

Cramond & Barnton Community Council (0243)

There is no policy promoting food growing. Encouragement of provision for, and development of, allotments and other community food growing spaces is an essential element to achieve sustainability, net zero (e.g. reduction in food miles) and community health objectives.

Wright PDL (0078), Tarmac (0244), Mr T Klan (0307), Hallam Land Management (0615), Stirling Developments Limited (0303), Homes for Scotland (0404), Dandara East Scotland (0757), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Green Belt and Countryside are different designations that serve different purposes. This is recognised in their distinct glossary definitions. They should not be treated the same in policy terms under Env 18.

The green belt should have a primary objective of preventing unplanned large scale urban sprawl and /or coalescence of settlements. This was what they were originally introduced to do in the UK.

Applying the same level of protection to both green belt and Countryside areas restricts opportunities for residential sites to come forward in the event of a housing land shortfall.

This policy is contrary to SDP1 and SPP, including para 49 which sets out specific reasons for designating green belt.

Env 18 acts as a deliberate blocker to any greenfield development.

The Green Belt already contains many established uses that do not conform with policy and guidance tests for new development. This demonstrates a need to revise policy.

Existing uses can be intensified without any benefit to the area and community.

The overly restrictive policy Env 18 adversely affects the appearance and ability to access the Green Belt.

Stirling Developments Limited (0303)



Subjective language around views is unclear.

Stewart Milne Homes (0118), Taylor Wimpey (0200), Stirling Developments Limited (0303), BDW Trading (0350), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

The policy does not include the needed provision that permits sustainable housing development in the event that there is shortfall in five-year effective housing land supply.

Hillside Leisure Ltd (0080)

The policy fails to provide sufficient allowance for proposals which help improve human health and wellbeing, particularly through improving access to countryside recreation.

This is needed to align with para 52 of SPP, action 3 of draft NPF4 and the Plan's own outcome supporting physical and mental health as well as Env 6 to improve green and blue networks.

The Pentland Trail Centre is an example of a proposal which the policy does not adequately support. This is despite it delivering the above objectives with particular reference to long-distance walking and cycling routes and opportunity further improve these links from the city to the Pentland Hills. Further comments and modifications sought in relation to this proposal are addressed in 'Issue 18: Blue Green Network Proposals.'

Grange/Prestonfield Community Council (0192)

The proposed policy is the same as equivalent policies in previous LDPs which have failed. They have permitted degradation of Green Belt land and encouraged industrial style intensification of agricultural etc uses and sports facilities, which have an adverse environmental impact and have not increased public access to these areas, which should be attractive to work and live in and visit.

Cala Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0469)

This policy intention requiring an applicant to demonstrate the proposal does not 'detract' from the rural environment or landscape, does not define a magnitude of effect or impact to be justified. It therefore fails to guide an applicant on the information required about the degree of impact arising.

There are established impact assessment techniques particular for landscape character with a clearly defined the assessment methodology which this policy should allow to be used.

The policy should allow the Council and an applicant to refer to an established body of case law about significant adverse impacts relating to townscape and landscape character. This case law has been set by the requirement in SESplan Policy 7 a. to demonstrate that greenbelt housing land releases need to be in accord with local townscape and landscape character.

NatureScot (0528)



The policy should better align with draft NPF4 and provide a clearer role in the delivery of the Spatial Strategy.

#### Esk Property LLP (0726)

Locating age-restricted social care and retirement type uses within an urban fringe location is essential to the successful creation and operation of this type of development. Amenity space, allotment gardens and immediate access to the countryside can all be readily achieved.

Age-restricted housing operators generally seek sites which will facilitate low-density (predominantly one and some two storey) development. Alternative sites, appropriate for higher density housing developments, mean that developers of such facilities are priced out of the land market and there is a resultant inability to compete on mainstream housing sites and deliver suitable facilities.

The principles of 20-minute neighbourhoods will also dictate that there will be parts of the city where there is an identified need for social care/ housing for older people that cannot be met on brownfield sites.

### **Env 20 – Protection of Trees and Woodlands**

#### Crosswind Development Ltd (0184), Edinburgh Airport Limited (0761)

This policy is unreasonable. It sets a presumption against development that will impact on any tree i.e. this will apply to trees located outside conservation areas and trees that are not protected by Tree Preservation Orders, so will include trees with no arboricultural value.

#### Melford Development Ltd (0308), AREAA (0358)

Any application which involved the felling of a tree, even if offering significant environmental benefits overall, would be contrary to this policy.

Object as this policy is wholly based on arboricultural grounds and ignores other material policy considerations. It reduces viability and delivery of development sites and has the potential to sterilise many urban sites and undermine the overall strategy of the Plan.

This policy makes no provision need and demand for development compared to be balanced against social and environmental benefits.

There is inadequate provision for off-site compensatory planning and/or other mitigation to off-set carbon impact, ecological and social loss from trees on site.

#### Hillend Leisure Ltd (0080)

The wording of the policy is ambiguous and is not supported by the accompanying text within City Plan, particularly in relation to what would comprise 'good arboricultural reasons' and how a Tree Survey would be deemed to be competent.

#### AREAA (0358)

This policy should be modified.

James Forbes (0647)

A replacement tree has, for ten years or more, much lower carbon capture capacity than a mature tree. The policy requirements around replacement trees does not fully acknowledge this.

The Woodland Trust (0774)

This policy should be strengthened.

Trees can also have cultural value and this is not reflected in the policy.

For ancient woodlands and ancient and veteran trees a presumption against any development is not enough. Ancient woodlands and ancient and veteran trees are invaluable and irreplaceable. Average carbon stocks per hectare in Scotland's ancient woodlands are 31% higher than the average for all woodland types. As such any loss is contradictory to both national and Edinburgh's own ambitions to become net zero by 2030. They are also some of the most biodiverse habitats in the UK supporting a vast array of species. As such, they will be essential to tackling the intertwined climate and nature emergencies.

Where trees are retained and/or at-risk root protection areas (RPA) should always be used. For ancient and veteran trees, where a more precautionary approach is warranted, RPA distances should be greater than the standard buffers stated in BS 5837:2012.

Edinburgh World Heritage (0339)

The policy should be modified.

Leith Central Community Council (0614)

Existing trees should be protected by default and the practice of felling trees and plant new ones in exchange should be revisited in terms of environmental impacts.

A requirement for precise tree specification with an associated minimum age and size and for the specification of the ground condition where each tree is to be planted.

Craigleith-Blackhall Community Council (0403), Neil Watt (0439), Richard Graveling (0135)

These comments also apply to Env 21.

Question the main policy support being policies Env 23 and 24 as shown on the Proposals Map.

Open Space site at Junction of Craigcrook Road and Queensferry Road. As with Hillhouse Road Woods in north-east proposal map area, policy Env 24 has little relevance to the site at the Craigcrook Road/Queensferry Road junction. The maintenance of the remaining

trees is important and policy Env 20 is far more relevant. Again, the Plan should be adjusted to reflect the local circumstances.

Both this site and Hillhouse Road Woods (north-east proposals map area) form part of the wider tree cover along Queensferry Road (including Corstorphine Hill and Davidson's Mains Park) and both sites are important not only aesthetically in providing an impressive entrance to Edinburgh but also in reducing traffic pollution. The continued long term protection of both sites is therefore important including tree cover.

Hillhouse Road Woods (Queensferry Road) opposite Blackhall Library have been identified as a tree covered site on Ordnance Survey maps since 1852. The trees are mature, should be continued to be protected and the site is critically important for biodiversity. The trees are mature safeguarded by a tree preservation order and with no public access means that the site is also important for biodiversity, albeit not recognised formally by the City Council. While there is a passing reference to policies Env 20 - Protection of Trees and Woodlands and Env 21 -Protection of Biodiversity, these policies are significantly more important for the continued safeguarding of Hillhouse Road Woods than policy Env 24 and this should be recognised in the City Plan 2030.

Past experience with regard to this site has shown that developers will seek to expose loopholes, arguing that open space which is not accessible to the public has little status or value. Likewise to apply a policy that has little reference to the site could enable developers to exploit the irrelevance of policy Env 24. It is notable that a previous developer's aspiration for a care home development on the Hillhouse Road Wood site was dismissed in a planning appeal in 2019 by a Scottish Government Reporter (Planning appeal reference: PPA-230-2250). There has been no change in circumstances since 2019 to overturn that decision in order to justify the clearance of many of the trees on the site and permit development to meet developer's wishes. Tree protection and biodiversity should continue to underpin the continued protection of the open space on this site, with more prominent links to policies Env 20 and 21. (see also comments below on other Queensferry Road sites)

Although the North of Corstorphine Hill zone has protection from numerous designations some more specific targeted planning is called for, by expanding the Special Protection Area or having a similar designation to cover the area.

## **Env 21 – Protection of Biodiversity**

Archie Clark (0003)

Criterion e. has four asterisks indicating a footnote however there is currently no such footnote.

Richard Doake (0436)

Env21 c does little to protect against significant and potentially inappropriate change of use of areas within Local Nature Reserves and Local Nature Conservation Sites

21c is overly vague about allowing "adequate offset" of adverse impacts of any proposed development within Local Nature Reserves and Local Nature Conservation Sites. It is not clear what this may mean and does not impose any restriction on types of development

which may be detrimental to the natural environment, contrary to the areas designations.

William Mason (0438)

At a time of a Biodiversity crisis, it is unacceptable for a plan to state that designated sites (i.e. items a, b, c of the list) can be developed if there are overriding reasons of public interest. Edinburgh Council has a responsibility to steward such areas for future generations.

Dr Tim Duffy (0503)

NPF4 policies came out after this draft of City Plan 'went to press' but these should be copied across in the next version of this plan.

James Forbes (0647)

No specific provision is made to protect small islands of privately owned biodiverse sites that aren't designated for nature conservation or protected species. NPF4 (policy 3) does a better job of this.

Edinburgh Airport Limited (0761), Crosswind Development Ltd (0184).

This policy should be modified.

Due to airport safeguarding, it is not always possible to carry out certain biodiversity requirements or enhancements and therefore, should not be a requirement for all development. This should be assessed on a case by case basis and required where appropriate and possible. The Civil Aviation Authority provided guidance on the risks associated with wildlife around aerodromes and this should be a consideration. The Airport are notified of developments within 13km to ensure Airport Safeguarding.

**Env 22 – Pentlands Hills Regional Park**

The Association for the Protection of Rural Scotland (0334)

Concerns about the capacity of the Park to accommodate visitors which need to be addressed. These include:

- Path erosion by walkers and off road cyclists; creation of ad hoc multiple paths to facilitate access
- Destruction of ground flora by foot/tyre pressure
- Is good camping guidance being followed?
- Should guidance for the safe and enjoyable/responsible use of the Park be reviewed with perhaps greater publicity for the Scottish Outdoor Access Code?

It is indicated that the policy does not fully address these issues, although overall the policy is supported.

**Modifications sought by those submitting representations:**

## **Env 18 - Development in the Green Belt and Countryside**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Replace para. 3.126 is replaced with the following;

*“Proposals for development in the green belt and Countryside will not be considered unless they are for a short-term (5 years) or of a reversible nature to ensure that prime quality agricultural land, or land of lesser quality that is locally important retains its capacity for food production in support of national goals for food security. Proposals will only be permitted in the countryside where they are a brownfield development or on land that is of LCA Class 4.1 or higher classification. These must take account of principle C in Scottish Land Use Strategy (‘Getting the best from our land’) which states: ‘Where land is highly suitable for a primary use (for example food production, flood management, water catchment management and carbon storage) this value should be recognised in decision-making.’*

*“Any development must not detract from the landscape and/or rural environment of the area in terms of quality, characteristics and views.”*

Scottish Government - Planning and Architecture Division - Development Plans Team (0309), Cramond & Barnton Community Council (0243)

City Plan should be modified to introduce new policy on food growing.

Wright PDL (0078), Tarmac (0244), Mr T Klan (0307), Hallam Land Management (0615), Stirling Homes Limited (0303), Homes for Scotland (0404), Dandara East Scotland (0757), Barratt David Wilson Homes (0677), Steve Loomes (0767)

‘Countryside’ and ‘Green Belt’ should be separated out to each have their own dedicated policies. These should not be as universally restrictive on development, particularly residential.

A clause should be added noting the opportunity to remediate, restore and redevelop the many vacant and derelict brownfield sites in the green belt.

Update proposals map to clearly differentiate between Green Belt and Countryside.

Update proposed plan text, including para. 2.61, to set out different objectives for Green Belt and Countryside.

It is indicated that less subjective language is used in respect of views.

Hillside Leisure Ltd (0080)

An additional criteria should be included within the policy to allow:

*“Appropriate built development to support viable, or make viable, countryside leisure and recreational proposals”.*

Grange/Prestonfield Community Council (0192)

No modification specified however it is stated this should be reviewed and altered. It is indicated that policy should be more restrictive in terms of uses that have adverse environmental impact such as industrial style intensification of agricultural uses and sports facilities.

Stewart Milne Homes (0118), Taylor Wimpey (0200), Stirling Developments Limited (0303), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767), BDW Trading (0350),

The policy should include a provision that permits sustainable housing development in the event that there is shortfall in five-year effective housing land supply.

Cala Management Ltd (0465), Hallam Land Management (0599) (0615) Miller Homes Limited (0649)

Amend policy wording to read as follows:

*Within the Green Belt and Countryside shown on the Proposals Map, development must meet one of the following criteria and must not have a significant adverse impact on the rural environment or landscape of the surrounding area in terms of its quality, characteristics and views:*

*a. For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use, or*

*b. For the change of use of an existing building, provided the building is of architectural merit or a valuable element in the landscape and is worthy of retention. Buildings should be of domestic scale, substantially intact and structurally capable of conversion, or.*

*c. For development relating to an existing use or building(s) such as an extension to a site or building, ancillary development or intensification of the use\*, provided the proposal is appropriate in type in terms of the existing use, of an appropriate scale, of high-quality design and acceptable in terms of traffic impact, or.*

*d. For the replacement of an existing building with a new building in the same use provided:*

- the existing building is not listed or of architectural / historic merit,*
- the existing building is of poor-quality design and structural condition,*
- the existing building is of domestic scale, has a lawful use and is not a temporary structure, and*
- the new building is of a similar or smaller size to the existing one, lies within the curtilage of the existing building and is of high design quality.*

NatureScot (0528)

Recommend that policy Env 18 is also amended:

*“Within the Green Belt and Countryside shown on the Proposals Map, development must meet one of the following criteria. It must also not detract from the rural environment or landscape and should contribute to climate change resilience, provide access to green networks and support nature networks.”*

#### Esk Property LLP (0726)

Definition of 'essential countryside location' should be broadened to include reference to specialist housing and elderly accommodation. This would relate to age restricted developments comprising assisted living, retirement (over 55) accommodation and care facilities.

To ensure this policy is only applicable to certain sites, a qualification could be added which requires the applicant to demonstrate there are insufficient similar age-restricted housing facilities in the surrounding area which can meet local demand.

#### **Env 20 – Protection of Trees and Woodlands**

#### Crosswind Development Ltd (0184), Edinburgh Airport Limited (0761)

The Council's policy in the extant LDP (Policy Env 12 – Trees) is sufficient and should be carried forward into City Plan 2030, with representation 0184 additionally nothing the policy title be updated to include the word “Woodlands”.

#### Melford Development Ltd (0308)

No specific wording is set out however it is stated that an overall relaxation in policy wording is sought, in particular accounting for viability and allowance for offsetting carbon across the city to compensate for loss on site.

#### Hillend Leisure Ltd (0080)

Further detail should be provided as to what would comprise 'good arboricultural reasons' and how a Tree Survey would be deemed to be competent.

#### AREAA (0358)

Reword Policy ENV 20 (p110) to read:

*“There is a presumption against development that risks having a damaging impact on any tree, groups of trees or woodland unless:*

- the Council accepts this is necessary for good arboricultural reasons; or*
- the loss of the tree or group of trees can be mitigated through compensatory planting or other ecological enhancements.*

*Such instances will take cognisance of the value of the tree(s) in terms of amenity, health benefits, biodiversity, townscape and landscape character, local amenity or climate change adaptation and mitigation.”*

#### James Forbes (0647)

There should be a more stringent and enforced requirement for replacement of trees removed for arboricultural (or any) reasons, whether or not as part of a development



proposal.

Any developer removing a mature tree should, in addition to appropriate replacement on site, be required to contribute the cost of sourcing and planting ten additional trees (per tree removed) elsewhere in the city, as part of the Million Tree City drive.

#### The Woodland Trust (0774)

No development should be approved that will result in the loss or an adverse impact on ancient woodlands and ancient and veteran trees or their ecological condition and this should be explicitly stated in the City Plan 2030 policies.

As ancient woodlands and veteran trees are irreplaceable the policy should not give the impression that the loss of this type of woodland can never be compensated for.

The policy should state that an RPA used for Ancient Woodlands and Veteran Trees should be a minimum of 15 times the diameter of the tree trunk or 5 metres beyond the canopy, whichever is the greater.

The cultural value of trees should this should be written into the policy alongside other considerations.

The mitigation hierarchy should always be employed, and all efforts must be made to avoid and minimise damage to trees before any mitigation is considered. This should be explicitly stated in the text.

#### Edinburgh World Heritage (0339)

Add new paragraph to read as follows:

*“The positioning and contribution of trees to designed landscapes, the setting of listed buildings and the character of conservation areas and the character of parks and gardens in historic areas should be understood so that decisions on tree retention, removal or addition of new trees of appropriate species can be well informed and the character of the historic environment conserved and protected.”*

This change is needed to appropriately protect and enhance the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site. To recognise the importance of trees as design features in planned historic streetscapes and landscapes, which each locality having a different landscaping style including the presence or otherwise of trees, placement and species.

#### Leith Central Community Council (0614)

It is indicated existing trees should be protected by default.

A requirement for precise tree specification with an associated minimum age and size and for the specification of the ground condition where each tree is to be planted.

#### Craigleith-Blackhall Community Council (0403), Neil Watt (0439), Richard Graveling (0135)



Hillhouse Road Woods (Queensferry Road) opposite Blackhall Library should be recognised as being critically important for biodiversity and its woodland. The same applies to Open Space site at Junction of Craigcrook Road and Queensferry Road

There should be more prominent links between this policy, Env 20 and Env 23.

Modify the Plan to introduce a Special Protection Area or similar designation to cover North of Corstorphine Hill zone.

## **Env 21 – Protection of Biodiversity**

Archie Clark (0003)

It is indicated that there needs to be a supporting text paragraph created expands upon criterion e.

Crosswind Development Ltd (0184), Edinburgh Airport Limited (0761)

Amend the supporting text (page 111) for this policy as follows:

*“3.132 In addition to safeguarding existing features, proposals should enhance biodiversity value, which should be demonstrated by complying with policy Env 37 (Designing in positive effects for Biodiversity) and the mitigation hierarchy in that policy as well as according with Edinburgh Design Guidance.”*

Richard Doake (0436)

The policy should require that any development should relate in some way to nature conservation.

William Mason (0438)

Alter the wording to say that *'all sites with statutory designations for their biodiversity will be preserved for the benefit of future generations and no development within them or in their vicinity that could affect their viability will be considered'*.

NatureScot (0528)

Recommend that the final sentence of paragraph 3.133 (page 111) is amended to:  
*“Development that would have an adverse effect on site integrity on any of these internationally important areas will only be approved in exceptional circumstances and where imperative reasons of overriding public interest can be demonstrated.”*

Dr Tim Duffy (0503)

NPF4 should be copied across in the next version of this plan.

James Forbes (0647)

Language from NPF4 (policy 3) should be used to protect small islands of privately owned

biodiverse sites that are not designated for nature conservation or protected species.

Craigleith-Blackhall Community Council (0403), Neil Watt (0439), Richard Graveling (0135)

Hillhouse Road Woods (Queensferry Road) opposite Blackhall Library should be recognised as being critically important for biodiversity and its woodland. The same applies to Open Space site at Junction of Craigcrook Road and Queensferry Road

There should be more prominent links between this policy, Env 20 and Env 23.

Modify the Plan to introduce a Special Protection Area or similar designation to cover North of Corstorphine Hill zone.

## **Env 22 – Pentlands Hills Regional Park**

The Association for the Protection of Rural Scotland (0334)

Amend criterion a) to insert ‘..safe and...’ prior to the word ‘peaceful’

It is also indicated that the policy text should address concerns around: the impact of high volumes of visitors like path erosion by walkers; creation of ad hoc multiple paths, destruction of ground flora, negative impacts from camping and general safe/responsible practice by users of the park.

### **Summary of responses (including reasons) by planning authority:**

## **Env 18 - Development in the Green Belt and Countryside**

Archie Clark (0003), Juniper Green and Baberton Mains Community Council (0306), Scottish Government - Planning and Architecture Division - Development Plans Team (0309), Cramond & Barnton Community Council (0243).

Rural land typically has a different nature of amenity value than dedicated areas of open space as more typically found in urban areas. The Council considers the amenity value of this land in a rural context is adequately captured by the policy’s last part of the first paragraph that proposals *should not detract from the rural environment*, including in terms of its quality.

The Council recognises the value of land in terms of food production, especially in relation to prime agricultural land.

The Council notes the representations (0003 and 0306) seeking a complete prohibition of development on any land classed as grades 1, 2, 3.1 and 3.2. This is considered too onerous and out of alignment with SPP CD096 and draft NPF 4 CD099.

In terms of SPP CD096 para. 80 and Draft NPF 4 CD099 Policy 31 (h), the Council notes that representation 0309 has stated that policy text should be created setting out the position in respect of agricultural land as set out in SPP para. 80.

The Council considers that the circumstances in which development is permitted under NPF4 CD099 and SPP CD096 are similar to those in Env 18 in relation to what development is potentially considered acceptable. For example, the first bullet points of SPP and NPF 4 fall within the terms criterion a) of Env 18 and the second bullet points of SPP and NPF4 are comparable to criterion c) of Env 18. It is acknowledged there are some difference, however, the Council considers that Env 18 would not permit development that is significantly different to that permitted by SPP para. 80 and Draft NPF 4 Policy 31 (h). Where Env 18 does make provisions for some additional forms of development, e.g. criterion (b) relating to changes of use, these typically involve little or no additional loss of undeveloped land. As a result the Council does not believe a dedicated new section of policy is merited.

The Plan does have proposals for food growing (see BGN 4 to BGN 7, Issue 18 'Green Blue Network Proposals'). The Council considers that the Plan's policies allow for such proposals coming forward. This includes as part of development sites where there is a minimum proportion of the site which is expected to comprise open space (which can include growing areas). **No modification proposed.**

Wright PDL (0078), Tarmac (0244), Mr T Klan (0307), Hallam Land Management (0615), Stirling Developments Limited (0303), Homes for Scotland (0404), Dandara East Scotland (0757), Barratt David Wilson Homes (0677), Steve Loomes (0767)

The Council agrees that Green Belt and Countryside are different terms, however they are grouped in the same policy as the Council considers the policy provisions should apply to both designations, as many of the key principles underpinning to them are the same.

This would not restrict opportunities for residential sites to come forward in the event of a housing land shortfall. Policy Hou 4 would apply in such circumstance.

The Council considers the policy aligns with SPP CD096, draft NPF 4 CD099, and the SDP. The Council notes that the policy is the same as the existing LDP, which was Examined under the same SDP CD087 and SPP in effect today (although over 5 years have now passed since the SDP was adopted).

The Council agrees that the proposed policy is designed to place different restrictions on development than exist for the urban area, however, this is not 'block' development but instead direct it to more appropriate locations outwith the designated countryside and Green Belt. The existence of historic, existing uses that do not conform to the current policy is not the key issue at hand – it is about the appropriateness of the policy for guiding new development. The Council considers the policy as proposed correct.

The proposals map does differentiate between Green Belt and Countryside so the change by the representation here is not clear. If it is sought that the legend of the proposals map labelling should refer to different subject policies for countryside and green belt then this is already addressed above. The Council maintains this position in relation to the change requested to Strategy text in paragraph 2.61 where the representor wishes paragraph 2.61 to set out different objectives for Green Belt and Countryside.

The Council does not consider that the policy needs to make provision for the remediation or restoration of brownfield land since these would not require planning permission in their

own right, unless associated with development. The Council does not support making provision redevelopment of brownfield land in this policy. Such development should be considered as an exceptional circumstance based on the merits of such a case. **No modification proposed.**

Stewart Milne Homes (0118), Taylor Wimpey (0200), Stirling Developments Limited (0303), BDW Trading (0350), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Policy Hou 4 sets out the position in the event of a shortfall relating to housing land supply. It does not need to be duplicated in this policy. **No modification proposed.**

Wright PDL (0078), Tarmac (0244), Mr T Klan (0307), Hallam Land Management (0615), Stirling Developments Limited (0303), Homes for Scotland (0404), Dandara East Scotland (0757), Barratt David Wilson Homes (0677), Steve Loomes (0767), Stewart Milne Homes (0118), Taylor Wimpey (0200),

The language around views is considered clear and appropriate for LDP policy. The Council's 'Guidance on development in the Countryside and Green Belt' (2019) CD052 provides further information on this. **No modification proposed.**

Hillside Leisure Ltd (0080)

Criterion a) of the proposed policy relates to proposals which are for the purposes of 'countryside recreation'. This is considered sufficient for assessing support, or otherwise, of the type of proposal raised in this representation. **No modification proposed**

Grange/Prestonfield Community Council (0192)

The Council considers the proposed policy does make provision against adverse environmental impact. Not all developments are required to demonstrate they will improve access to the countryside, however, this is considered appropriate since is more important for certain types of proposal than others. Consideration of the merits of the policy should not be based on individual decisions on previous applications. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0469)

The wording is clear in setting out that there is not an acceptable 'partial' level of detriment which is supported by this policy and the Council considers this an appropriate threshold to set for the landscape impact of proposals in the green belt and countryside. The Council's policy is not changing in this regard from its existing LDP. **No modification proposed.**

NatureScot (0528)

City Plan has other policies ensuring development promotes green networks and is resilient to climate change (see Env 6 and 7 respectively as particular examples) and so no modification proposed. If the Reporter sees merit in the modification however then Council has no issue in a modification as set out in this representation. However, it is

important that existing wording concerning the quality, characteristics and views of the surrounding area is retained.

#### Esk Property LLP (0726)

The Council does not consider age-restricted social care and retirement type uses as necessitating a countryside or green belt location, or even that this is always preferable given the importance of having walkable neighbourhoods and public transport links in the proximity in many cases. **No modification proposed.**

The following representations were received in support of this policy as proposed:

John Martin (0008), SEPA (0012), The Association for the Protection of Rural Scotland (0334), George Kelsey (0386), Richard Doake (0436), Scottish Wildlife Trust Lothian Group (0560), Kathryn Poolman (0574)

#### **Env 19 - Special Landscape Areas**

The following representations were received in support of this policy as proposed:

Grange/Prestonfield Community Council (0192), The Association for the Protection of Rural Scotland (0334), George Kelsey (0386), Scottish Wildlife Trust Lothian Group (0560), Kathryn Poolman (0574)

#### **Env 20 – Protection of Trees and Woodland**

Melford Development Ltd (0308), Crosswind Development Ltd (0184), Edinburgh Airport Limited (0761)

The Council is generally content with robust requirements of this policy in line the principle of resisting the loss of trees of merit unless for specific reasons. .

Some concern about the strength of this policy is because it has been interpreted as requiring tree works to be necessary for arboricultural reasons *prior* to assessing the value of a tree/woodland values. This is not the intention for the policy. The Council considers the arboricultural reasons for works to be one factor to be considered *alongside* to the value of the tree(s)/woodland as part of a single, overall and holistic judgement.

No modification proposed in this regard, however, should the Reporter be so minded the Council has no issue for the purposes of clarity in a modification which changed the present wording from ‘..and also accounting for..’. to instead read ‘..whilst also accounting for...’.

Notwithstanding this, the Council agrees the first paragraph makes it clear that proposals should generally be avoiding harm to trees/woodlands on, or adjacent, to development sites. This is the reason for the general presumption against such harm.

It is for the decision maker to weigh all relevant material considerations and policies in assessing a proposal the Council considers it reasonable that this policy should be clear in its presumption against harm to or loss of trees of value without justification. **No modification proposed.**

Hillend Leisure Ltd (0080)

The Council considers the terms 'competent tree survey' and 'good arboricultural reasons' as sufficient for the purposes of this policy. The give a high-level policy descriptor of what is required whilst leaving adequate scope for guidance to advise on further detail. Edinburgh has guidance on protected trees which has been updated in 2022 and which will be reviewed regularly to ensure it is fit for purpose, including making sure it sets out requisite detail on new policy in an appropriate timescale. **No modification proposed.**

AREAA (0358)

The modification would have the effect of saying all tree loss could be justified through compensatory planting or other ecological enhancement. The Council fundamentally disagrees with this as it does not take account of particularly valuable trees or groups of trees, or the timescale for ne planting to have a similar value, including for carbon sequestration. **No modification proposed.**

James Forbes (0647)

The policy accounts for a tree/woodland's value in terms of climate change mitigation. This allows for consideration that some trees and woodlands will have greater value than others.

Matters regarding enforcement are not addressed here, however, the Council considers the wording allows the policy to be enforceable.

The Council does not consider the level of contributions proposed to off-set tree loss is proportionate and therefore would not meet the necessary legal tests for contributions. **No modification proposed.**

The Woodland Trust (0774)

This policy does recognise the value of trees in terms of townscape character. Accordingly, no modification is proposed, however, should the Reporter see merit in recognising 'culture' as a distinct value in its own right then the Council has no issue for the purposes of clarity in a modification adding 'cultural' to the list of values a tree(s) may have in the final sentence of the first paragraph of this policy.

The Council appreciates the value of ancient woodlands and ancient and veteran trees. This is accounted for in the proposed policy as part of the various factors that are listed as being of relevance in the consideration of the value of trees and woodland.

The Council does not believe an unequivocal statement preventing any works to ancient woodlands and ancient and veteran trees is appropriate given these may actually benefit from some works in certain circumstances for arboricultural reasons.

The Council considers that the methodology to root protection (as accepted through established British Standard guidance) is appropriate to avoid risk of harm, including to ancient woodland and veteran trees.

The Council considers the policy does follow the principles of the mitigation hierarchy given it is clear that mitigation for the loss of trees will only be considered following demonstration the loss of trees is appropriate. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council agrees that trees have a significant role in complementing a range of built heritage assets. The wording of the policy as proposed requires acknowledgement of the value of trees in terms of their value in a 'townscape' context, with 'landscape character' also noted. Historic Environment is considered to be adequately covered between these two terms. **No modification proposed.**

Leith Central Community Council (0614)

The Council does not agree that policy itself should be a 'standard' precise tree specification for replacement planting as the optimal specification could vary depending on the circumstances (for example space available to plant the tree(s) in question.) The development management process is the more appropriate juncture to establish particular details where specific circumstances can be taken into account.

The Council considers this policy does set out that the default situation is the retention of existing trees rather than simply accepting the principle of replacement from the outset. **No modification proposed.**

Neil Watt (0439), Craigmyle-Blackhall Community Council (0403), Richard Graveling (0135)

Env 20 applies to all trees of merit. The Plan's Proposals Map does not map protected trees, – including trees that are TPO'd. Env 21 protects non-designated sites as well as those with formal designations.

Policies Env 21, 20 and 23 are all contained in the Natural Environment policy section together. Further cross reference is not considered necessary.

The Council considers the existing designations that cover North of Corstorphine Hill and the proposed policies in the Plan are sufficient to protect the various habitats and species. **No modification proposed.**

The following representations were received in support of this policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192), The Association for the Protection of Rural Scotland (0334), George Kelsey (0386), NatureScot (0528), Scottish Wildlife Trust Lothian Group (0560), Kathryn Poolman (0574), James Forbes (0647), RSPB (0648); Leith Harbour and Newhaven Community Council (0776)

**Env 21 – Protection of Biodiversity**

Archie Clark (0003)

This was a typographic matter with an earlier published edition of the Plan and has since been remedied in due process. **No modification proposed.**



Edinburgh Airport Limited (0761), Crosswind Development Ltd (0184).

If an applicant considers the policy is not relevant to their proposal this can be part of their case. The Council considers it is not for policy to make exceptions where specific material considerations will be assessed. for the suggested approach would preclude potential for enhancement and/or mitigation which could avoid a safeguarding conflict. **No modification proposed.**

Richard Doake (0436)

The Council considers the meaning of 'offset' to be clear when read in context of the full development principle, including that it must relate to the integrity of the interests of the affected LNCS and LNR. **No modification proposed.**

William Mason (0438)

The Council considers it reasonable for matters of overriding public interest to be a material consideration in addition to the ecological matters raised in this policy.

This policy is required to account for the varying statutory and locational context of the sites in question and the fact that the nature and need for the development in question may be a material factor worth consideration. **No modification proposed.**

NatureScot (0528)

Although the Council considers the wording of 3.133 generally expresses the overall emphasis required, should the Reporter see merit in the representation the Council has no issue in a modification as specified.

Dr Tim Duffy (0503), James Forbes (0647)

The first sentence of this policy (and corresponding footnote with a single asterisk) address non-statutory habitat features, which can include those of a small scale as set out in the supporting footnote. **No modification proposed.**

Neil Watt (0439), Craigleith-Blackhall Community Council (0403), Richard Graveling (0135)

Env 20 applies to all trees of merit. The Plan's Proposals Map does not map protected trees, – including trees that are TPO'd. Env 21 protects non-designated sites as well as those with formal designations.

Policies Env 21, 20 and 23 are all contained in the Natural Environment policy section together. Further cross reference is not considered necessary.

The Council considers the existing designations that cover North of Corstorphine Hill and the proposed policies in the Plan are sufficient to protect the various habitats and species. **No modification proposed.**

The following representations were received in support of this policy as proposed:



Grange/Prestonfield Community Council (0192), The Association for the Protection of Rural Scotland (0334), George Kelsey (0386), Scottish Wildlife Trust Lothian Group (0560), Kathryn Poolman (0574), James Forbes (0647), RSPB (0648)

## **Env 22 – Pentland Hills Regional Park**

The Association for the Protection of Rural Scotland (0334)

The Council does not consider it would be appropriate for the Plan to be the means to manage the volume of visitors to the park. If the objective was agreed on grounds of preserving the character of the park then this would require non-planning actions to secure it.

The Council considers the main objectives relating to the park are addressed in the policy.  
**No modification proposed.**

The following representations were received in support of this policy as proposed:

Grange/Prestonfield Community Council (0192), George Kelsey (0386), Scottish Wildlife Trust Lothian Group (0560); Kathryn Poolman (0574), Friends of the Pentland Hills (0787)

### **Reporter's conclusions:**

### **Reporter's recommendations:**

Issue 16	Blue Green Infrastructure, Water and Amenity Policies	
Development plan reference:	Policies Env 34 - 36, Env 37, Env 6	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Ambassador Group (0683) Andrew Brown (0007) Archie Clark (0003) AREAA (0358) Barratt David Wilson Homes (0677) BDW Trading (0350) Caroline Thomas (0570) Crosslane Co-Living SPV 2 Limited (0687) Crosswind Developments Limited (0184) Edinburgh Airport Limited (0761) Edinburgh World Heritage (0339) Esme Clelland (0778) Grange/Prestonfield Community Council (0192) Hazledene House Limited (0695) Helen MacLeod (0364) Homes for Scotland (0404) HUB Residential (0582) James Forbes (0647) Juniper Green &amp; Baberton Mains Community Council (0306) Leith Central Community Council (0614)</div> <div>Leith Harbour and Newhaven Community Council (0776) Mark Ockendon (0419) May Lawson (0410) NatureScot (0528) NHS Lothian (0596) Ratho and District Community Council (0289) RSPB (0648) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) Scottish Water (0342) SEPA (0012) Shiela Strathdee (0448) Steve Loomes (0767) Stewart Milne Homes (0118) Taylor Wimpey (0200) The Association for the Protection of Rural Scotland (0334) The Coal Authority (0765) Wildlife Trust Lothian Group (0560) Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	Policies relating primarily to Blue Green Infrastructure (Env 6, Env 36 and Env 37), Amenity (Env 33), Flood Risk (Env 35) and Pollution and Air, Water and Soil Quality (34)	
Planning authority's summary of the representation(s):		
<b>Natural Environment Strategy</b>		
<u>Leith Central Community Council (0614)</u>		
City Plan should be more specific about how it is helping the City reaching the target of 730000 trees.		
City Plan should also use a stronger word than encourage for new tree planting and it should be made mandatory in some instances		
Existing trees should be protected by default and the practice of felling trees and plant new ones in exchange should be revisited in terms of environmental impacts.		

A requirement for precise tree specification with an associated minimum age and size and for the specification of the ground condition where each tree is to be planted.

Helen MacLeod (0364)

The City needs more natural spaces should be planted to support wildlife.

## **Env 6: Green Blue Infrastructure**

Wright PDL (0078), Homes for Scotland (0404), HUB Residential (0582), Barratt David Wilson Homes (0677); Ambassador Group (0683); Crosslane Co-Living SPV 2 Limited (0687); Hazledene House Limited (0695); Steve Loomes (0767)

Green and blue infrastructure (such as biodiversity, increased vegetation and deculverting watercourses) take up space and is difficult to deliver on smaller, brownfield sites and considering the density aspirations of the Plan.

City Plan policies should not misalign with relevant Scottish Water guidelines, nor national building standards regulations.

Crosswind Developments Limited (0184)

Object to criterion A of Policy Env 6. The policy has a blanket assumption in favour of deculverting which may not always be appropriate. It should be considered on a site-by-site basis to establish if it is viable. Flexibility should be provided within the policy.

This policy will lead to the sterilisation of much land that could otherwise support development by requiring a buffer of up to 80m wide. As a result appropriate compensation mechanisms should be put in place to compensate landowners.

0761 (Edinburgh Airport Limited)

The policy should be amended.

Ratho and District Community Council (0289)

The policy does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

This policy create entail extra work and if resourcing is not available then it wil not be possible to adequately assess compliance.

How the Council will ensure full compliance with the 'catch-all' requirements in paragraph 3.95?

AREAA (0358)

Insufficient nuance as to offer flexibility in particular circumstances. Areas of the green network may for example be of particularly low quality, neither useable accessible nor of any measurable biodiversity value. In certain circumstances there will be situations where “green” sites offer development potential and their development could contribute to wider enhancement objectives nearby/elsewhere and/or the delivery of development in line with identified need.

NatureScot (0528)

As currently written the applicability clause precedes the requirement of tailoring measures to the scale and nature of development. The draft National Planning Framework 4 is clear that developments of different scales should protect, enhance and expand green blue infrastructure and networks.

Wildlife Trust Lothian Group (0560)

Increasing habitat connectivity, through the development of ecological networks, is often seen as the principal mechanism for ensuring healthy ecosystems, increasing natural sustainability through greater species diversity. These also offer protection against the effects climate change. However, this can be achieved to full effect when the connectivity, parks, woodland, street trees and blue/green roofs, are an extension to the existing habitat, through the use of native species. It is of important to mitigate against the spread invasive species or of samples that would introduce and cause disease outbreaks in the local flora and fauna.

SEPA (0012), Edinburgh World Heritage (0339)

The policy should be modified.

James Forbes (0647)

Erasing green blue features and starting again should be not just discouraged but forbidden except in very rare circumstances.

**Env 33 – Amenity**

Archie Clark (0003)

Policy has too much scope for exceptions to nominal policy requirements.

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Achieving acceptable standards for odour, space provision, noise, daylight, sunlight, privacy or immediate outlook required under this policy is challenging on brownfield sites with such high density aspirations.

Greater clarity and detail is needed on specifics as this policy as proposed it is too vague, including in relation to odour, space standards, noise, daylight, sunlight, privacy or immediate outlook.

## **Env 34 Pollution and Air, Water and Soil Quality**

Archie Clark (0003)

Length of policy and support text is too long

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

City Plan should be cognisant of draft NPF4, including policy 14 which seeks health impact assessment for all proposed development that is considered to be likely to generate significant health effects, or is within the categories of national developments, or major developments, or is EIA development. In relation to national or major developments, provision for regulations for an assessment of likely health effects is also included in the Planning (Scotland) Act 2019.

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

What would constitute a 'significant adverse affect'?

This policy must align with Building Standards.

## **Env 35 – Reducing Flood Risk**

Archie Clark (0003)

Too much scope for weaken or circumvent policy requirements which can be exploited by developers.

Nature Scot (0528)

Evidence from Dynamic Coast shows that we will be facing some very challenging issues in future regarding flooding and coastal change. The importance of resilience and adaptation of communities and infrastructure is an essential matter for City Plan 2030 to consider and plan for. The local development plan cannot do this itself.

Juniper Green & Baberton Mains Community Council (0306)

It is indicated that this policy should remove the various options to weaken or circumvent previous categorical statements as otherwise developers will exploit this.

Shiela Strathdee (0448)

The flood risk mitigation required under this policy should be nature based and should be paid for by developers.

Scottish Water (0342)

Increase the emphasis on betterment and addressing existing known flood risk through the planning of new development. We would support the inclusion of this as the aims of the policy appear to remain on not increasing existing issues.

Crosswind Development Ltd (0184)

This policy should be modified or alternatively a statement in the supporting text should be added to clarify that proposals for de-culverting/ re-meandering of rivers should be properly evidenced and justified, with appropriate consultation undertaken with SEPA and with cooperation and agreement sought among landowners to ensure proposals are deliverable.

NHS Lothian (0596)

Flood risk requirements should be able to be discussed on a case-by-case basis.

Edinburgh Airport Limited (0761)

This policy should be amended

Leith Central Community Council (0614)

The policy should put the onus on applicants which should, by default, systematically demonstrate flood mitigation measures and provide a Flood Risk Plan.

There should be an explicit presumption against residential development in flood areas without in-principle support from SEPA.

Edinburgh World Heritage (0339)

This policy should address the need to improve certain existing situations as Major redevelopments of existing sites may increase existing issues in terms of flood risks and surface water management. These existing sites may not have or have insufficient mitigations measures in place in terms of flood risks and surface water management. It will be important to significantly improve the management of flood risks

**Env 36 – Designing for Surface Water**

Archie Clark (0003)

What is meant by water flowing 'above ground'?

What is the problem with using underground storage tanks?

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Over what time period is the first 5mm of surface water to be managed under this policy?

Archie Clark (0003), Scottish Water (0342)

In point (e) it is not clear whether the policy supports development which does not remove existing surface water pipes or not if it does remove the pipes?

Scottish Water (0342)

In section 3.168 Surface water in the combined sewer network can increase the risk of impacts on the water environment and/or sewer flooding as a consequence of more intense rainfall....It is important to note that our position is clear as set out in our Surface Water Policy (<https://www.scottishwater.co.uk/Business-and-Developers/NEW-Connecting-to-Our-Network/Developing-housing-and-commercial-properties/Preparing/Surface-Water-Policy>) will not allow any additional surface water from new development into the combined sewer network.

James Forbes (0647)

The policy should be amended.

Edinburgh Airport Limited (0761)

Changes are required to para 3.169 to acknowledge Airport Safeguarding matters within 13km of the aerodrome to ensure this policy does not lead to unmanageable risks in terms of aircraft safety.

Edinburgh World Heritage (0339)

Changes are needed to make clear the nominal requirements may not be suitable in the Old and New Towns of Edinburgh World Heritage Site.

**Env 37 – Designing-in Positive effects for Biodiversity**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

This policy allows exceptions to the initial statement of requiring positive effects, in particular criterion b. and para 3.171.

Archie Clark (0003)

If exceptions to are to be allowed then financial contributions towards mitigation must be sufficient to provide overall positive effect and be rigidly applied.

NatureScot (0528), Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The applicability clause precedes the requirement of scale and nature. In the draft National Planning Framework 4, the national policy is clear that developments of different scales should protect, enhance and expand green blue infrastructure and networks.

Paragraph 3.185 could be interpreted as providing measures that are sufficient regardless of scale of development.

A reference to BS 8683 is included in paragraph 3.187 however this document currently incurs a charge. As the Local Development Plan should be accessible to all we suggest that an additional source that does not require payment will help communities and third sector organisations to use the plan more fully.

Edinburgh Airport Limited (0761), Crosswind Development Limited (0184).

This policy should be amended.

It is not always possible to carry out biodiversity enhancements or requirements and therefore a degree of flexibility is required in the policy. Having criteria worded as 'should' rather than 'must' be undertaken provides that flexibility and the introduction of supporting text makes the reasons clear.

The Association for the Protection of Rural Scotland (0334)

Wording detailing 'positive measures for biodiversity' should make clear the conservation of complete habitats and ecosystems is usually far better in terms of biodiversity than taking measures species by species.

RSPB (0648)

There is a significant focus within the City Plan 2030 on the development of brownfield sites, it is therefore recommended including the following text recognising that many mature brownfield sites support high levels of biodiversity, particularly invertebrates and plants.

### **All policies**

Mark Ockendon (0419)

All policies should include provision for new greenery, whether trees or other planting, to support a sense of wellbeing, carbon sequestration, and integrating nature with the community.

### **Modifications sought by those submitting representations:**

#### **Natural Environment Strategy**

Leith Central Community Council (0614).

City Plan should be more specific about how the target of 730000 trees shall be reached.

A stronger word than *encourage* should be used for new tree planting and it should be made mandatory in some instances.

Existing trees should be protected by default and the practice of felling trees and planting new ones in exchange should be revisited. Where accepted then there should be a requirement for precise tree specification.

Helen MacLeod (0364)



It is indicated that more natural spaces should be planted to support wildlife.

## **Env 6: Green Blue Infrastructure**

Wright PDL (0078), Homes for Scotland (0404), HUB Residential (0582), Barratt David Wilson Homes (0677); Ambassador Group (0683); Crosslane Co-Living SPV 2 Limited (0687); Hazledene House Limited (0695); Steve Loomes (0767)

No specific wording proposed however it is indicated that less stringent requirements are set out for blue green infrastructure and that allowance should be made for other factors that have a bearing on the developability of a site such as density. It is also indicated requirements of this policy should align with Scottish Water guidelines and Building Standards.

### Crosswind Developments Ltd (0184)

A proposed amendment (Page 102) is set out below:

*“As far as applicable to the scale and nature of the development, proposals must protect, enhance and link to the city’s green/blue network through the following steps:*

- a. incorporating and enhancing existing green and blue features such as biodiverse vegetation and watercourses on the site, where possible and appropriate;*
- b. providing new green blue infrastructure on-site which is linked within the site through careful consideration of site layout; and*
- c. linking new green blue infrastructure to the city wide green blue network using components such as parks, woodland, street trees and blue/green roofs where possible and appropriate.”*

### 0761 (Edinburgh Airport Limited)

A proposed amendment is set out below:

“As far as applicable to the scale and nature of the development, proposals should protect, enhance and link to the city’s green/blue network through the following steps:

- a. incorporating and enhancing existing green and blue features such as biodiverse vegetation and de-culverting watercourses on the site, where possible and appropriate;
- b. providing new green blue infrastructure on-site which is linked within the site through careful consideration of site layout; and
- c. linking new green blue infrastructure to the city wide green blue network using components such as parks, woodland, street trees and blue/green roofs where possible and appropriate.”

### Ratho and District Community Council (0289)

No specific wording proposed however it is indicated that it should be specified that the proposals do not include any standing water or could give rise to areas of standing water.

#### Juniper Green & Baberton Mains Community Council (0306)

No specific modification specified. It is indicated that there may be a desire to remove the extra work required in this policy if resourcing is not available to adequately assess compliance.

#### AREAA (0358)

Reword opening line of Policy ENV 6 to read "As far as applicable to the scale and nature of the development, proposals must protect, enhance and link to the elements of the city's green/blue network that are of value through the following steps:"

#### NatureScot (0528)

The leading sentence of the policy (page 102) should be amended to "Development proposals will be supported where they can demonstrate, in proportion to their scale and nature, that they will protect, enhance and link to the city's green network through the following steps:"

#### Wildlife Trust Lothian Group (0560)

No modification specified but it is indicated that it should be made clear that habitat created should be extensions of existing habitat and for invasive species to be mitigated against.

#### SEPA (0012)

Support the first line of the policy but would add to it as follows:

*"As far as applicable to the scale and nature of the development, proposals must protect, enhance, and link to the city's green/blue network while contributing to the recovery of ecosystems services through the following steps:..."*

Amend criterion b to read as follows:

*"(b) providing new green blue infrastructure on-site which is linked within the site through careful consideration of site layout 'and the facilitation of opportunities for direct community contribution of their needs and aspirations.'"*

Add a reference to "blue/green walls" to criterion c given these are important blue green infrastructure measure for a densely populated context urban context.

For paragraph 3.95 it is proposed to add text to the effect: - *'Natural flow paths of water must be identified at the visioning stage and inform design. The interaction of blue-green infrastructure with wider infrastructure types to maximise place-led social, economic and environmental benefits will be at the heart of best practice in future fitting design.'*

It is proposed water efficiency should also be a key consideration for this policy although no specific wording is proposed in this regard.

#### Archie Clark (0003)

Clarity is needed on how the Council will ensure full compliance with the 'catch-all'

requirements in paragraph 3.95.

James Forbes (0647)

No text specified but it is indicated that the policy should be strengthened to make clear erasing of existing blue and green features should not be allowed except for 'exceptional circumstances'.

Edinburgh World Heritage (0339)

Amend main policy wording to read:

*"As far as applicable to the scale, nature and historic character of the area and its development, proposals must..."*

New main policy bullet (a, b, c) to be added as follows:

*"d. conserve and where possible enhance the special interest and positive character of historic green blue infrastructure"*

Add new supporting text (e.g. new para next to 3.93, 3.94) as follows:

*"In recognition of the outstanding quality of Edinburgh's historic green blue infrastructure, and their contribution to social, environmental and economic wellbeing, proposals should demonstrably; understand their special heritage interest, conserve and where possible enhance them to conserve them as important and irreplaceable assets."*

These changes are needed to appropriately conserve Edinburgh's Outstanding Universal value as a World Heritage Site. To recognise the outstanding quality and contribution of historic and existing green blue infrastructure (including undesignated sites) and ensure appropriate protection as important and irreplaceable assets.

**Env 33 – Amenity**

Archie Clark (0003)

Policy should be amended to give less scope for exceptions to nominal policy requirements.

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Greater clarity and detail is needed on specifics as this policy as proposed it is too vague.

**Env 34 - Pollution and Air, Water and Soil Quality**

Archie Clark (0003)

It is indicated that the length of the policy and support text should be reduced.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

No modification stated however it is indicated that the policy should consider requiring health impact assessments for developments likely to generate significant health effects, or is within the categories of national developments, or major developments, or is EIA development.

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Clarity must be provided on what would constitute a 'significant adverse affect'

**Env 35 – Reducing Flood Risk**

Archie Clark (0003)

There should be less scope for exceptions to nominal policy requirements.

Nature Scot (0528)

Paragraph 3.166 (page 118) should be amended to include reference to the need to prepare some form of Coastal Adaptation Plan.

Juniper Green & Baberton Mains Community Council (0306)

It is indicated that this policy should remove the various options to weaken or circumvent notional requirements.

Shiela Strathdee (0448)

It is indicated that the policy should be more explicit that the flood risk mitigation required under this policy should be nature based and should be paid for by developers.

Scottish Water (0342)

Increase the emphasis on betterment and addressing existing known flood risk through the planning of new development.

Crosswind Development Ltd (0184)

Request criterion d. is amended as follows:

"d. fail to allow sufficient space to incorporate and enhance existing features into the proposal's design which would add to the blue network, for example de-culverting and re-meandering rivers, unless it is demonstrated this is not viable."

Alternatively, a statement in the supporting text should be added to clarify that proposals for de-culverting/ re-meandering of rivers should be properly evidenced and justified.

NHS Lothian (0596)

It is indicated that the requirements in respect of flood risk to be addressed by the site should be able to be discussed on a case-by-case basis.

Edinburgh Airport Limited (0761)

Criteria d of the policy should be reworded as follows:

“d. fail to allow sufficient space to incorporate and enhance existing features into the proposal’s design which would add to the blue network, for example de-culverting and re-meandering rivers, unless it is demonstrated this is not viable.”

Leith Central Community Council (0614)

It is indicated this policy should, by default, systematically demonstrate flood mitigation measures and provide a Flood Risk Plan.

There should be an explicit presumption against residential development in flood areas without in-principle support from SEPA.

Edinburgh World Heritage (0339)

It is indicated that this policy should address the need to improve certain existing situations.

**Env 36 – Designing for Surface Water**

Archie Clark (0003)

Further explanation is needed in relation to the following;

- What is meant by water flowing ‘above ground’?
- Why underground storage tanks are inappropriate?

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Plan should clarify the time period in which the first 5mm of surface water are to be managed under this policy?

Archie Clark (0003), Scottish Water (0342), Juniper Green & Baberton Mains Community Council (0306)

Clarity on the purpose of point (e) to confirm if this seeks for the removal of existing surface water pipes.

Scottish Water (0342)

This section may need clarity on the purpose of point (e). Could this section be linked to how 'viability' is assessed?

James Forbes (0647)

Policy should not allow proposals which take no account of surface water draining from outside the site.

Edinburgh Airport Limited (0761)

Changes are required to para 3.169 to acknowledge Airport Safeguarding matters within 13km of the aerodrome to ensure this policy does not lead to unmanageable risks in terms of aircraft safety:

*“3.169 Water can be stored above ground in basins, ponds or in features such as blue roofs so long as this is not an unmanageable risk in terms of Airport Safeguarding. Development must where feasible avoid the use of underground tanks and maximise evapotranspiration to reduce both volume and rate at which water enters rivers and drainage systems. Further detail on how the above principles should be achieved as part of developments is set out in the Edinburgh Design Guidance and associated appendices as well as the Council’s ‘Vision for Water Management for the City of Edinburgh’.”*

Edinburgh World Heritage (0339)

Add to first paragraph as follows:

*“Detailed applications involving the construction of one or more buildings and major redevelopments of existing sites will be supported by this policy...”*

This change is needed as Major redevelopments of existing sites may increase existing issues in terms of flood risks and surface water management. These existing sites may not have mitigations measures in place in terms of flood risks and surface water management. This proposal can significantly improve the management of flood risks.

Amend paragraph 3.169 as follows:

*“...Water can be stored above ground in basins, ponds or in features such as blue roofs where appropriate”*

It is indicated that, as de-culverting watercourses could increase the flooding risk in some instances then they should always be supported by a flood risk assessment.

**Env 37 – Designing-in Positive effects for Biodiversity**

Archie Clark (0003); Juniper Green & Baberton Mains Community Council (0306)

No specific wording stated however it is indicated the policy should allow less scope for exceptions to developments delivering overall positive effects for biodiversity on-site.

It is also indicated that the policy must be more explicit that, where exceptions are allowed, these must be sufficient to still result in overall positive effect

NatureScot (0528)

The leading sentence of the policy should be amended to “In proportion to their scale and nature, development proposals must have a positive effect on biodiversity by following the sequence of principles below:”

Paragraph 3.170 (page 120) of the Proposed Plan should be amended to: “The built environment will benefit from biodiversity corridors that protect and allow the movement of species across the city. Developments should contribute towards Edinburgh’s wider green / blue and nature networks as required by their location, scale and density. Ecological features within development such as living roofs, rain gardens, swift bricks and hedgehog highways are valuable assets within the city-wide networks.”

Direction should be provided on how “it should be ensured that all opportunities to embed measures ... have been explored” in paragraph 3.173 (page 120). A reference to Nature Scot’s “Developing with Nature” guidance may be acceptable.

Nature Scot (0528), Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

It is indicated that the reference to BS 8683 in para 3.172 should be removed and an alternative inserted. One such alternative could be the Developing with Nature guidance that Nature Scot are currently consulting on, which will be finalised prior to the adoption of City Plan 2030: <https://www.nature.scot/doc/consultation-developing-nature-guidance>. Reference to this new guidance would also help provide a route through which “opportunities to embed” could be demonstrated. The guidance includes a section on “Selecting the measures that are appropriate” that may be useful to users of the plan in support of Policy Env 37.

Crosswind Development Limited (0184), Edinburgh Airport Limited (0761)

Propose that the policy (page 119) is reworded as follows:

*“So far as applicable to the scale and nature of the development, proposals should must have a positive effect on biodiversity by ensuring proposals follow the sequence of principles below:*

- a. Avoid impact, wherever possible, by identifying existing species, spaces and features of biodiversity on-site and including these within new developments;*
- b. Where impact cannot be avoided this effect should must be minimised, for example by prioritising the retention of the most the important areas for of ecological networks;*
- c. Any remaining adverse impacts should must be wholly mitigated by new biodiversity measures; and*
- d. Additional improvements should then be included, where required, to tilt the balance of impact from neutral to an overall positive effect for biodiversity, for example through incorporating measures to improve the conservation status of notable species.*

*Consideration of biodiversity should include, but is not limited to, soils, habitat networks and environmental quality within and linking to a site.”*

The Association for the Protection of Rural Scotland (0334)

No specific wording cited however it is stated that wording detailing 'positive measures for biodiversity' should make clear the conservation of complete habitats and ecosystems is usually far better in terms of biodiversity than taking measures species by species.

RSPB (0648)

Include the following text:

*"Many mature brownfield sites support high levels of biodiversity, particularly invertebrates and plants. Therefore, ecological surveys focused on these groups will be needed to identify existing species and features of biodiversity on-site so that they can be included within new developments. There must also be adequate, qualified, resource within the Council to assess the results of the surveys."*

## **All policies**

Mark Ockendon (0419)

All policies should include provision for new greenery, whether trees or other planting.

### **Summary of responses (including reasons) by planning authority:**

## **Natural Environment Strategy**

Leith Central Community Council (0614), Helen MacLeod (0364)

A greater level of detail on proposals involving tree planting will be set out in the Council's next Forestry and Woodland Strategy. The Council considers that in high level terms the Plan does support the ambition to plant significantly more trees. E.g. Policy 27 (see issue 11: Design and Placemaking) sets out new requirements for minimum tree canopy coverage for development sites as well as strengthened policy Env 20 (see Issue 15: Natural Environment policies) setting out details on protecting existing trees, including the requirement that the specification of these new trees is to be appropriate. It is for the development management process and potentially landscaping plans to address further specifics on new planting details. **No modification proposed.**

## **Env 6: Green Blue Infrastructure**

Wright PDL (0078), Homes for Scotland (0404), HUB Residential (0582), Barratt David Wilson Homes (0677); Ambassador Group (0683); Crosslane Co-Living SPV 2 Limited (0687); Hazledene House Limited (0695); Steve Loomes (0767)

Green blue infrastructure is just as important in urban, dense sites so the Council does not accept that requirements should be lessened in these locations, given it is still deliverable on smaller sites, adapted to the context. e.g. it is multifunctional so as to maximise the benefits in the space available, with recreational open space also serving for wildlife and water management. The Council does not consider City Plan misaligns with Scottish Water guidelines. **No modification proposed.**

Crosswind Developments Limited (0184), Edinburgh Airport Limited (0761)

In general, the Council expects de-culverting to be a preferred option, however, paragraph



3.167 under policy Env 35 does clarify such de-culverting is sought whenever possible i.e. accepting there may be circumstances it is impracticable.

The provision of buffers along watercourses is important for providing and maintaining riparian habitat, recreation, flood risk and water management. The width of such buffers is proportionate to the watercourse in question in line with SEPA guidance (page 24 of SEPA's Planning Background Paper: Water Environment 2017) CD129 however where buffers are provided these will also often function as part of a site's open space requirement. As such they will not necessarily sterilise significant amounts of a site as need to provide for open space under existing and proposed open space policy (Adopted LDP policy Hou 3 and City Plan policy Env 32 respectively) **No modification proposed.**

Ratho and District Community Council (0289)

This is a site specific consideration more appropriately addressed in individual applications. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306)

The Council does not expect an excessive level of additional work will be created as a result of this policy. **No modification proposed.**

AREAA (0358)

Where a green network within/adjacent to a site is of limited existing value there is scope for development to enhance it as set out in the proposed policy. Paragraph 3.96 also makes provision for the principle of enhancement of the green blue network off-site where on-site provision is not possible and this does provide flexibility where it is demonstrated that the preferred policy approach is not practical. **No modification proposed.**

NatureScot (0528)

The Council considers that the first clause of the proposed policy wording is about establishing the *extent* to which the policy applies rather than necessarily *if* it applies.

The Council acknowledges NPF4 is likely to be adopted soon and once this occurs Reporter(s) may wish to take this into account during Examination. **No modification proposed.**

SEPA (0012)

This policy is intended to address a wide range of green blue infrastructure in different contexts and to maximise its full range of benefits, including ecosystem services. The Council is satisfied the 'high level' language used achieves this and considers adding additional clarifications as proposed would detract from the simplicity of language which is key to this policy. There are other, related policies, where more specific details on the implementation of blue green infrastructure in more specific contexts are set out, e.g. Env 36 Designing for Surface Water. **No modification proposed.**

Wildlife Trust Lothian Group (0560)

The Council considers the points in this representation are not requiring the policy text to be altered (since there is no misalignment). Issues such as specification of native species are more appropriately addressed through guidance. **No modification proposed.**

Archie Clark (0003)

Council planning officers, including those with more specialist ecological knowledge who can support particular cases where needed, can ensure the terms of paragraph 3.95 are fulfilled as required. Evidentially much of the work involved is on applicants themselves in the first instance, however the Council considers itself able to ensure compliance with the terms of the text in question. **No modification proposed.**

James Forbes (0647)

The policy does state that green blue infrastructure should be retained rather than erased, with any loss of such infrastructure being an exceptional circumstance. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council considers it appropriate that this policy should, in principle, apply to developments in historic contexts. As such it is not considered appropriate to introduce the historic character as a factor in the degree to which the policy should apply by way of the first modification sought in representation.

This policy shall have effect alongside other policies (such as Env 1) which ensure that developments, including their green and blue infrastructure required under Env 6, shall be cognisant of the characteristics of built heritage of an area. As such the new criterion d) and the new supporting text both proposed in representation are not considered necessary for this policy. **No modification proposed**

The Council notes that the following representations support the policy as proposed:

Leith Harbour and Newhaven Community Council (0776), Grange/Prestonfield Community Council (0192), HUB Residential (0582), RSPB (0648), Ambassador Group (0683)

### **Env 33 - Amenity**

Archie Clark (0003)

The Council considers the policy is clear on the requirements to be met and does not leave open license for exploiting exceptions. **No modification proposed.**

Stewart Milne Homes (0118), Taylor Wimpey (0200), BDW Trading (0350), Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

The Council does not agree that the policy should leaving open the issue of the extent of compliance with this policy depending on context. It is for the decision maker to assess It is not for LDP policy to account for the variables of a particular proposal.

The Council considers the proposed policy provides sufficient detail, with the supporting paragraph making clear that guidance provides additional information on interpretation. This guidance addresses in more detail the issues raised in representation. **No modification proposed.**

The following representations were received in support of this policy as proposed:

Grange/Prestonfield Community Council (0192), Scottish Wildlife Trust Lothian Group (0560), SEPA (0012)

### **Env 34 – Pollution and Air, Water and Soil Quality**

Archie Clark (0003)

The Council considers the policy length is proportionate the nature of the matter that it addresses. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The policy does direct decision makers to consider health impacts as applicable.

Notwithstanding this, the Council acknowledges NPF4 is likely to be adopted soon and once this occurs Reporter may wish to take this into account during Examination. **No modification proposed.**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

This policy does not conflict with Building Standards, although they generally address different matters. The term significant adverse effect is appropriate for the purposes of policy application. Individual applications and decision makers can apply this more specifically on a case by case basis reviewing impacts arising and receptor proximity and sensitivity. It is not practicable for policy wording to account for every eventuality. **No modification proposed.**

The following representations were received in support of this policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192), Scottish Wildlife Trust Lothian Group (0560), RSPB (0648), The Coal Authority (0765)

### **Env 35 – Reducing Flood Risk**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Council considers the policy text itself is clear on the stated requirements. The final paragraph of the policy and the policy supporting text itself provide assistance on interpretation in the event exceptional circumstances may apply but this does not itself lessen the applicability of proposals to meet the stated, clear policy requirements. **No modification proposed.**

Shiela Strathdee (0448)

The Council considers the final sentence of supporting paragraph 3.165 is adequate in setting out the position on the nature based mitigation, where mitigation in principle is considered appropriate. **No modification proposed.**

Scottish Water (0342)

The Council considers that criterion (d) of this policy does mean that, where relevant, development shall contribute to betterment rather than simply avoiding harm. The final paragraph of the policy text itself will also result in betterment in many situations since it will mean that new developments should not always be able to simply continue to practice of discharging surface water into sewer networks even when this the current practice on-site. The Council also notes that the title of the policy is now proposed to be '*Reducing Flood Risk*' to reflect the sentiment of betterment. **No modification proposed.**

Nature Scot (0528)

The Council agrees that resilience and adaptation of communities and infrastructure is important, including in the context of flooding and coastal change as demonstrated very clearly in the work by Dynamic Coast CD135. The Council does recognise the importance of progressing a Coastal Adaptation Plan. The purpose of this policy is for guiding and assessing development so it is not considered the place for setting out this intention. **No modification proposed.**

Crosswind Development Ltd (0184), Edinburgh Airport Limited (0761), NHS Lothian (0596)

Viability is a material consideration which is more appropriately addressed at the stage of individual planning applications where the range of specific variables can be more precisely understood and considered. It is not necessary for it to be explicitly stated in policy terms as to cases where it may be applicable. **No modification proposed.**

Leith Central Community Council (0614)

The Council considers that the policy puts the emphasis on applicants to demonstrate compliance, with the supporting text noting the need for Flood Risk Assessments, including relevant measures to be incorporated. The Council considers criterion (a) appropriately addresses the circumstances of how a proposed development is considered if it is at risk of flooding and that this is in line with national policy, particularly part (b) of Policy 13 of draft NPF 4 CD098. The process for SEPA involvement for such applications is covered by existing legislation. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council considers this policy makes provision for the improvement of existing situations, in particular criterion d. and also the requirement that surface water should not be discharged into the sewer network. Policy Env 36 sets out high standards for proposals to meet in terms of surface water management. In all of the above these requirements ensure adequate management of water and flood risk irrespective of

whether they are redevelopment proposals. Where such proposals do relate to a site with poor existing handling of surface water example then the effect of Env 36 shall be to require improvement.

De-culverting as a general principle has a net positive effect on flood risk given it reduces potential for bottlenecks, in addition to other benefits. Notwithstanding this, it is acknowledged that de-culverting would alter how and where water would behave in a flood event. The Council considers it self-evident an FRA would be needed to accompany proposals involving de-culverting. **No modification proposed.**

The following representations were received in support of this policy as proposed:

Andrew Brown (0007), SEPA (0012), Sheila Strathdee (0448), Caroline Thomas (0570), Grange/Prestonfield Community Council (0192), May Lawson (0410), Scottish Wildlife Trust Lothian Group (0560), RSPB (0648)

### **Env 36 – Designing for Surface Water**

Archie Clark (0003),

The Council considers it sufficiently clear what ‘water flowing above ground’ refers to. There are several reasons underground storage tanks are not the optimal solution for handling surface water. Firstly, they do not achieve the range of other ecosystem benefits that can be achieved from handling surface water above ground as part of nature based solutions. Secondly, once their finite attenuation capacity is exceeded then they create a ‘bottleneck’ in the handling process of surface water which then results in adverse flood risk events focused in particular points which greatest a greater severity in impact. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The intensity of rainfall events may vary, as does the rate at which the rainfall fills up a site’s capacity to retaining the first 5mm of rainfall. The key issue is not the time period over which this 5mm is intercepted, but rather that it represents the first 5mm of any given rainfall event. **No modification proposed.**

Archie Clark (0003), Scottish Water (0342), Juniper Green & Baberton Mains Community Council (0306)

The Council agrees with the representations noting the issue in relation criterion (e) giving the opposite impression of what was intended regarding the removal of surface water pipes. The Council acknowledges this is a drafting error and should be corrected as a minor drafting/technical matter by removing the words ‘..fail to..’ from the criterion.

Scottish Water (0342)

The purpose of criterion e. is to remove surface water pipes which are no longer needed as a result of surface water being separated from the sewer network. **No modification proposed.**

James Forbes (0647)

The Council considers that the policy does require proposals to take account of surface water behaviour outwith the site – see criterion c. requiring consideration of overland flow paths and criterion a requiring Surface Water management Plan. Both of these elements should consider the surrounding context. **No modification proposed.**

Edinburgh Airport Limited (0761)

The Council does not consider it necessary to modify the supporting text to confirm the position specifically in relation to airport safeguarding. This is a site specific consideration which can be addressed as and when applicable if/when such applications are submitted. **No modification proposed.**

Edinburgh World Heritage (0339)

The first modification sought is not needed as the City Plan existing wording ‘...construction or change of Use of one or more buildings...’ would capture redevelopments.

The second modification proposed is not needed as this policy sets out the default expectation. The decision maker on any given application has the prerogative to consider if other considerations such as heritage may come into conflict with the stated terms of this policy and thus justify a different approach. **No modification proposed.**

The following representations were received in support of this policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192), Scottish Wildlife Trust Lothian Group (0560), Caroline Thomas (0570), RSPB (0648)

**Env 37 – Designing-in Positive Effects for Biodiversity**

Archie Clark (0003)

The Council agrees and considers that the policy makes provision for this. **No modification proposed.**

Archie Clark (0003); Juniper Green & Baberton Mains Community Council (0306)

The overall effect of the policy is to create positive effects. Criterion b. is part of how this process is to be achieved in the most appropriate way. It does not exist in isolation. In conjunction with the other criteria an overall positive effect is achieved. **No modification is proposed.**

Nature Scot (0528), Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The first clause of the proposed policy wording is about establishing the *extent* to which the policy applies rather than necessarily *if* it applies.

The Council notes that paragraph 3.170 states that the extent of enhancement will be proportionate to the scale of the development.

Paragraph 3.172 also refers to the CIEEM guidance on Biodiversity Net Gain principles CD136 which is free to access. The Council acknowledges that the emerging Developing with Nature guidance shall be finalised soon and the Reporters may wish to give consideration to this during the course of Examination. **No modification proposed.**

Crosswind Development Limited (0184), Edinburgh Airport Limited (0761)

The policy wording sets out requirements to be met in order for proposals to be supported by this policy. Accordingly, the use of the word 'must' is considered appropriate in this instance. It is for the decision maker to assess a particular proposal in with the context of Plan policies and other material considerations. The policy makes as clear as possible what proposals it lends support to. **No modification is proposed.**

The Association for the Protection of Rural Scotland (0334)

The Council considers the policy sets out the first preference is for conservation of complete habitats and ecosystems through the order of the criteria. **No modification is proposed.**

RSPB (0648)

The Council considers that criterion a. of the policy sets out the requirement suggested. The additional text is not needed. The Council considers it may unintentionally risk other species and circumstances not mentioned by giving a lesser importance by omission even when these merit equal consideration.

The last sentence of the paragraph relates to a matter of resourcing for the Council rather than the City Plan policy itself and so is not considered appropriate for inclusion in the supporting text. **No modification proposed.**

The following representations were received in support of this policy as proposed:

SEPA (0012), NHS Lothian (0596), Grange/Prestonfield Community Council (0192), Scottish Wildlife Trust Lothian Group (0560), Esme Clelland (0778)

## **All policies**

Mark Ockendon (0419)

It is not necessary to duplicate the requirements relating to new greenery across every policy as policies such as Env 6 (Green Blue Infrastructure) already apply as appropriate to each proposal. **No modification.**

## **Reporter's conclusions:**

## **Reporter's recommendations:**

Issue 17	Open Space Policies	
Development plan reference:	Policies Env 23 - 24, Env 31 - 32	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Ambassador Group (0683)</div><div>Archie Clark (0003)</div><div>AREAA (0358)</div><div>Barratt David Wilson Homes (0677)</div><div>CALA Management Ltd (0465)</div><div>Celia Mainland (0447)</div><div>Crosslane Co-Living SPV 2 Limited (0687)</div><div>Crosswind Developments Limited (0184)</div><div>Dandara East Scotland (0757)</div><div>Defence Infrastructure Organisation (0124)</div><div>Edinburgh Airport Limited (0761)</div><div>Edinburgh World Heritage (0339)</div><div>Forth Ports Limited (0496)</div><div>George Kelsey (0386)</div><div>Goff Cantley (0032)</div><div>Grange/Prestonfield Community Council (0192)</div><div>Hallam Land Management (0599)</div><div>Harrison Developments Limited (0460)</div><div>Hazledene House Limited (0695)</div><div>Homes for Scotland (0404)</div><div>HUB Residential (0582)</div><div>Ian Ross (0423)</div><div>James Forbes (0647)</div><div>Jennifer Inglis (0437)</div><div>Jim Henry (0096)</div><div>Leith Central Community Council (0614)</div><div>Leith Harbour and Newhaven Community Council (0776)</div></div><div><div>Kathryn Poolman (574)</div><div>Melford Development Ltd (0308)</div><div>Miller Homes Limited (0649)</div><div>NatureScot (0528)</div><div>NHS Lothian (0596)</div><div>Pawel Stankiewicz (0445)</div><div>Philip Endecott (0079)</div><div>RSPB (0648)</div><div>Russell Gray (0444)</div><div>S Harrison Developments Limited (0460)</div><div>Scottish Wildlife Trust Lothian Group (0560)</div><div>SEPA (0012)</div><div>SportScotland (0671)</div><div>Steve Loomes (0767)</div><div>Stirling Developments Limited (0303)</div><div>Summix Capital Limited (0747)</div><div>Tessa Haring (0112)</div><div>The Association for the Protection of Rural Scotland (0334)</div><div>The Friends of Midmar Paddock (0121)</div><div>The Royal London Mutual Insurance Society Ltd (0149)</div><div>Unite Group plc (0628)</div><div>University of Edinburgh (0464)</div><div>Watkin Jones Group (0516)</div><div>Wright PDL (0078)</div></div></div>		
Provision of the development plan to which the issue relates:	Policies relating primarily to the protection of the existing Natural Environment	
Planning authority's summary of the representation(s):		
<div>Env 23 – Open Space Protection</div> <div>Archie Clark (0003)</div> <div>Policy title duplicates the word protection</div>		



Goff Cantley (0032), Jim Henry (0096),

This will see the loss of valued open space in housing estates to development. Env 23 has to take a lead from NPF 4 and be stronger in its defence of the Green Belt, blue/green networks and greenspaces. NPF4 promotes the enhancement of such spaces, nature recovery and facilitating biodiversity enhancement.

The Friends of Midmar Paddock, Edinburgh (0121)

We would contend that NPF 4, as drafted, offers stronger protection of our Green Belt and our blue/green networks, and far from suggesting they should be open to "development for a community purpose", it instead promotes the enhancement of such spaces, nature recovery and facilitating biodiversity enhancement. Env 23 has to take a lead from NPF 4 and should therefore be stronger in its defence of the Green Belt and greenspaces by dropping the reference, in sub-para. "e", to allowing "development for community benefit". If this reference is dropped, proposals can still be considered sui generis.

Jim Henry (0096)

The first bullet point is too subjective; who decides what is a significant impact?

Criterion b. is poorly worded and will not protect open spaces in housing areas.

There is no definition of what an "appropriate walking distance is". Alternative local and large standard spaces could therefore be considered adequately close even if a mile away and then used to justify the loss of more important spaces within neighbourhoods.

The supporting text means this policy does not protect open space that is not publicly accessible. All open space should be protected, irrespective of accessibility.

Space in private ownership could be fenced off making it inaccessible and may render unprotected by the policy. The resultant loss of open space could reduce open space below original standards and reduce the amenity of the area and wellbeing of residents.

This same supporting text conflicts with accessibility rights afforded under the terms of the Right to Roam legislation as land that is fenced off can still be enjoyed without right of access, for example Queen Street Gardens which are only accessible by key holders.

Criterion (c) takes no account of open space which can be discrete and not part of a continuous green or blue network whilst still being of value to the amenity and wellbeing of residents.

Criterion (d) allows a prospective developer to provide open space elsewhere or to pay a sum to improve an existing park, in both cases without specification of proximity to the development site. This could secure the release of valued open space without ensuring continued open space provision in the local area that maintains amenity and wellbeing for residents.

CALA Management Ltd (0465), Hallam Land Management (0599). Miller Homes Limited (0649)

Not all Local Standard or Large Standard spaces will be within 400m and 800m respectively and nor do they need to be to function as effective spaces within the local community network.

Goff Cantley (0032), Jim Henry (0096), The Friends of Midmar Paddock (0121)

Criterion "e", allows all kinds of development "for a community purpose". Many developments, other than private houses, can be described as being for a community purpose; from sewage treatment plants to casinos. This criterion is too subjective with no clear guidance as to who will decide if open space need outweighs public need. NPF 4 does not allow development of open space for community purposes

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The policy suggests that there are five criteria to comply with, when there is really fewer criteria, as criterion d. and criterion e. are alternatives to consider.

Defence Infrastructure Organisation (0124)

This policy makes no provision for the military to provide additional infrastructure for the Units displaced by the site disposals announced under the Better Defence Estate (BDE) programme. This is relevant to land within Dreghorn Barracks itself and the Service Families Accommodation. If development is required the MOD would, where possible, seek alternative provision.

University of Edinburgh (0464)

The wording of the policies should be more explicit about the need for a balanced approach to the wider benefits to use, participation, quality, and contribution to health and wellbeing for all users in the local and wider community.

CALA Management Ltd (0465), Hallam Land Management (0599),  
Miller Homes Limited (0649)

There may be circumstances where proposals will not be able to meet the requirements in the first three criteria of this policy but could still be important in securing an improvement in the quality of the existing open space network.

Wright PDL (0078), Homes for Scotland (0404)

No specific modification proposed however it is indicated that the requirements of this policy are too onerous.

The cumulative effect of this policy in combination other requirements is too onerous and make developments unviable

Ian Ross (0423)

This policy should not allow any future development.

#### Edinburgh World Heritage (0339)

Amend policy appropriately protect and enhance the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site.

#### Russell Gray (0444)

The recognition of the beauty of the environment needs to be matched by a commitment to preserve green spaces that are open to public access through recognised rights of way, to support the idea that the city is a place that belongs to us and where we all belong. The presumption must be that new development is not on locations that currently provide citizens with much needed access to green spaces and the natural world; new development needs to be redevelopment of existing residential/industrial areas.

### **Env 24 – Protection of Outdoor Sports Facilities**

#### Archie Clark (0003)

Need to ensure sports facilities are acknowledged as a valuable resource that need to be provided as part of 20-minute neighbourhoods.

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Lack of clarity on how it will be established whether there is a clear excess of sports to meet current and anticipated future demand.

#### Defence Infrastructure Organisation (0124)

Policy Env 24 is too rigid as it does not allow military development on outdoor sports facilities on military sites.

The outdoor sports facilities at Dreghorn are for military use and therefore are not open for general public use. The MOD has its own requirements for the provision of sports facilities for military personnel.

Dreghorn Barracks needs to provide additional infrastructure for Units displaced by site disposals announced under the Better Defence Estate (BDE) programme and will be subject to increased pressure for development. If development is required the MOD would, where possible, seek alternative provision.

#### University of Edinburgh (0464)

The wording of the policies should be more explicit about the need for a balanced approach to the wider benefits to use, participation, quality, and contribution to health and wellbeing for all users in the local and wider community.

#### SportScotland (0671)

The third and fourth bullet points of the policy should be changed to follow that of SPP (para 226), which is similar to the text in draft NPF 4.

there are a few drafting errors in the \* para after this (Para 3.140)

### **Env 31 – Useable Open Space in New Developments**

Celia Mainland (0447), James Forbes (0647)

There is no definition of what constitutes 'green space'. This should not include artificial surfaces such as plastic grass.

Jennifer Inglis (0437)

This policy only requires open space rather than greenspace and means developments will provide hard landscaping to meet open space requirements. This would be counter to Edinburgh's Net Zero ambitions and increase health and other inequalities, for example by reducing outdoor leisure opportunities for those without a garden. Good quality green space is important for human wellbeing, biodiversity, air quality flood control, carbon capture and storage.

Archie Clark (0003)

20% is too low for useable space. Previous Council standards required much more.

These standards should equally apply to 'existing' developments.

Developers will choose to make a financial contribution as this is an easier option for them.

Wright PDL (0078), Melford Development Ltd (0308), Homes for Scotland (0404), S Harrison Developments Limited (0460), Barratt David Wilson Homes (0677), Crosslane Co-Living SPV 2 Limited (0687), Steve Loomes (0767); The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496), HUB Residential (0582), Unite Group (0628), Ambassador Group (0683), Summix Capital Limited (0747), Dandara East Scotland (0757).

The requirement for 20% open space is too onerous.

It will reduce developable area and increase densities on the remaining part of the site to meet site capacities and mean the requirement for 65 dwellings per hectare (dph) is actually 75 dph.

It is not viable in conjunction with City Plan's brownfield strategy and density requirements and other design and environmental policies (including Env 26, 30, 31). Has the Council assessed the viability of these cumulative requirements?

This policy is too rigid in its open space requirements and does not allow for site-specific factors or viability in the decision making process. It does not take into account the scale, nature, location of development. For example, proposals may involve redevelopment of an established use or require costly ground remediation works which will already have environmental benefits. Business and industry developments (Use classes 4, 5 and 6)

often require large areas of floor space and an additional 20% open space would be excessive.

The Royal London Mutual Insurance Society Ltd (0149), Melford Development Ltd (0308), Forth Ports Limited 0496)

The specified rate of 10sqm per unit/20% (either on site or by financial payment) is arbitrary, unjustified and not evidenced.

The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited 0496)

Not all new-built development has a need for open space or have a damaging impact on the environment or amenity of the local area. It is not appropriate for the Council to extract advantages, benefits or payments from landowners or developers which are not directly related to the proposed development.

The requirement for a financial sum does not comply with the established Policy tests for planning obligations made under section 75 of the Act and as outlined in paragraphs 14 to 25 of Circular 3/2012. It particularly conflicts with tests relating to the 'relationship to the proposed development test' and 'Scale and kind'.

Watkin Jones Group (0516), Unite Group plc (0628), Summix Capital Limited (0747)

Purpose Built Student Accommodation is a distinct type of use and should not be treated the same as residential in terms of open space requirement e.g. no need for play space. It has a high level of internal amenity and is less reliant on large areas of useable greenspace, therefore as students are provided with high quality internal amenity and have access to alternative space and recreation elsewhere on campus. High quality multi-purpose space can increase development density and promote greater social interaction. The external amenity requirement should therefore be much lower than mainstream housing.

NHS Lothian (0596)

This policy does not address the need to ensure open space provision is accessible for a range of mobility needs.

Edinburgh Airport Limited (0761)

Given the nature of the airport, it is not appropriate or possible to include the provision of open space as part of a new development within the operational boundary. A degree of flexibility is required to the policy to allow the requirement to be assessed on a case by case basis.

## **Env 32 - Useable Communal Open Space and Private Gardens in Housing Developments**

Celia Mainland (0447)

There is no definition of what constitutes 'green space'. This should not include artificial surfaces such as plastic grass.

Jennifer Inglis (0437)

This policy only requires open space rather than greenspace and means developments will provide hard landscaping to meet open space requirements. This would be counter to Edinburgh's Net Zero ambitions and increase health and other inequalities, for example by reducing outdoor leisure opportunities for those without a garden. Good quality green space is important for human wellbeing, biodiversity, air quality flood control, carbon capture and storage.

Archie Clark (0003)

20% is too low for useable space. Previous Council standards required much more.

These standards should equally apply to 'existing' developments.

Developers will choose to make a financial contribution as this is an easier option for them.

The space requirements take no account of bins and bikes.

Leith Central Community Council (0614)

Allowance for contributions in lieu of on-site open space is too vague and can result in too many housing developments not meeting this policy by default.

Wright PDL (0078), Melford Development Ltd (0308), Homes for Scotland (0404), S Harrison Developments Limited (0460), Barratt David Wilson Homes (0677), Crosslane Co-Living SPV 2 Limited (0687), Steve Loomes (0767); The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496), HUB Residential (0582), Unite Group (0628), Ambassador Group (0683), Summix Capital Limited (0747), Dandara East Scotland (0757), Crosswind Developments Limited (0184), Hazledene House Limited (0695) The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496)

The requirement for 20% open space is too onerous.

It will reduce developable area and increase densities on the remaining part of the site to meet site capacities and mean the requirement for 65 dwellings per hectare (dph) is actually 75 dph.

It is not viable in conjunction with City Plan's brownfield strategy, building height, townscape and heritage considerations in addition to density requirements and other design and environmental policies. Has the Council assessed the viability of these cumulative requirements?

This policy is too rigid in its open space requirements and does not allow for site-specific factors or viability in the decision making process. It does not take into account the scale, nature, location of development. For example, proposals may involve redevelopment of an established use or require costly ground remediation works which will already have environmental benefits. Business and industry developments (Use classes 4, 5 and 6)

often require large areas of floor space and an additional 20% open space would be excessive.

Melford Development Ltd (0308)

The specified rate of 10sqm per unit/20% (either on site or by financial payment) is arbitrary, unjustified and not evidenced.

Leith Central Community Council (0614)

Conversions of front gardens into private parking should not be acceptable.

**Modifications sought by those submitting representations:**

**Env 23 – Protection of Open Space**

Archie Clark (0003)

Modify title of policy to remove duplication of the word 'protection'

Goff Cantley (0032), The Friends of Midmar Paddock, Edinburgh (0121)

Remove the reference in sub-para. "e" to allowing "development for community benefit". If this is done proposals proposal can still be considered 'sui generis'

Jim Henry (0096)

No specific wording proposed, however the following changes are inferred:

Greater clarity should be provided on the process for assessing 'significant impact' in criterion a.

Greater clarity should be provided on what appropriate walking distances equate to in criterion b.

Explanatory footnote text for criterion b should be amended to delete the caveat relating to public accessibility so all spaces protected, especially for spaces in housing estate.

Criterion c should include spaces that are not part of a wider green blue network.

Criterion d is not supported as it is proposed. If it is to be included it is indicated that upgrading of other spaces must be only be permitted if they are within a specified distance.

Criterion e should be amended to ensure that local residents and wider community support the proposed use.

Defence Infrastructure Organisation (0124)

Add a new criterion f as follows:

*f. for sites used by the Military there is a demonstrated military need to develop on areas of open space and alternative provision will be made available when possible.*

University of Edinburgh (0464)

Amend criterion e) in respect of Policy ENV 23.

CALA Management Ltd (0465), Hallam Land Management (0599),  
Miller Homes Limited (0649)

Amend wording of policy to read as follows:

*Proposals involving the loss of open space will not be permitted unless it is demonstrated that:*

*a. there will be no significant impact on the quality or character of the local environment, or*

*b. the loss of open space should not cause any existing homes to stop being within the appropriate walking distance of Local or Large standard open space\* and*

*c. the loss would not be detrimental to the wider green and blue network (including its continuity, visual amenity, water management function or biodiversity value); and either:*

*c i) there will be a local benefit, proportionate to the scale of the development, in allowing the development in terms of either alternative equivalent provision being made or improving an existing public park or open space, or*

*c ii) the development would be for a community purpose\*\* and have an overriding benefit to the local community and public that outweighs the loss of open space.*

Wright PDL (0078), Homes for Scotland (0404)

No specific modification proposed however it is indicated that the requirements of this policy are too onerous.

Ian Ross (0423)

This policy should not allow any future development.

Edinburgh World Heritage (0339)

Add a new bullet at second-to-last position to read:

*“The loss would not be detrimental to the character of historic areas of the city. Open spaces are a vital and significant design feature of town planning. The location and size of open spaces often defines the character of the historic built environment. These spaces should be protected against development in conservation areas to preserve their historic function, amenity and community values.”*

This is needed to appropriately protect and enhance the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site.



Russell Gray (0444)

It is indicated that there should be a new development is not on locations that currently provide citizens with much needed access to green spaces.

## **Env 24 – Protection of Outdoor Sports Facilities**

Archie Clark (0003)

Para 3.140 should clarify that the reference to city-wide resource means that this means sports facilities are to meet standards required for 20-minute neighbourhoods in new and existing settlements.

Wright PDL (0078), Homes for Scotland (0404), Barrat David Wilson Homes (0677), Steve Loomes (0767)

Greater clarity should be provided on how it will established whether there is a clear excess of sports to meet current and anticipated future demand.

Defence Infrastructure Organisation (0124)

The DIO are seeking the addition of criterion e detailed below;  
e. The proposed development relates to the loss of outdoor sport facilities that are located on military sites and have only been open for use by military personnel.

University of Edinburgh (0464)

Amend criterion e) in respect of Policy ENV 23 and introducing a similarly worded additional criterion to Policy ENV 24.

SportScotland (0671)

The third and fourth bullet points of the policy should be changed to follow that of SPP (para 226).

## **Env 31 – Useable Open Space in new Development**

Celia Mainland (0447), James Forbes (0647)

Exact wording is not specified however it is indicated that a definition of greenspace should be provided that precludes artificial surfaces and that this policy should require greenspace rather than just open space.

Jennifer Inglis (0437)

No wording specified however it is indicated that this policy should require greenspace rather than open space.

Archie Clark (0003)

No specific suggested text given however it is indicated that:

More than 20% of site areas should be useable open space

This policy should apply to existing developments

There should not be option to pay a financial contribution in lieu of providing space on-site.

Wright PDL (0078), Melford Development Ltd (0308), Homes for Scotland (0404), S Harrison Developments Limited (0460), Barratt David Wilson Homes (0677), Crosslane Co-Living SPV 2 Limited (0687), Steve Loomes (0767); The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496), HUB Residential (0582), Unite Group (0628), Ambassador Group (0683), Summix Capital Limited (0747), Dandara East Scotland (0757), The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496)

No specific suggested text however it is indicated that the requirement for 20% open space should be removed. Other representations indicate that the amount of open space required under this policy should be flexible and be cognisant of viability, site context nature of the proposal and uses both existing and proposed.

Watkin Jones Group (0516)

Generally, a qualitative approach to assessing open space and public realm in proposals should be adopted instead of a quantitative assessment

Summix Capital Limited (0747),

A more flexible requirement reflecting the nature of PBSA developments should be included.

Unite Group plc (0628)

This policy should not apply to PBSA.

Melford Development Ltd (0308)

The wording of this policy should be relaxed.

The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited 0496)

Amend policy to reflect an approach which considers the scale, nature, location of development and site specific constraints and, considerations, as follows:

*ALL-Proposals containing new-build development (except householder development and housing proposals covered by policy Env 5 above) shall include the provision of good quality, attractive, useable and publicly accessible open space where appropriate, taking into account the scale, nature, location of development and site specific constraints and considerations.*

*\*\* Wherever possible, this provision shall take the form of extensions and/or improvements to the green and blue network.*

3.167 *\*This policy ensures that development proposals, (other than private and affordable housing development) include appropriate open space provision. This includes specialist housing built for occupation by groups such as students or the elderly. The supporting text for Env 32 also sets out an explanation of how open space should be provided as well as what type of space should be counted as open space, with this addressed further in the Edinburgh Design Guidance and associated appendices.*

3.168 *\*\*Where proposals necessitate open space provision and do not meet requirements of this policy on-site, proposals may be supported if appropriate provision or financial contribution is made, subject to compliance with circular 3/2012, to implement an action which improves park/open space/green network provision in the area (or access to these), with this normally needing to be an identified action in this Plan and/or Open Space Strategy.*

Alternatively maintain the approach in the extant Local Development Plan (Policy Env 20)

NHS Lothian (0596)

Reference should be made within the Policy to ensure that any provision is accessible for a range of mobility needs.

Edinburgh Airport Limited (0761)

The wording should be amended to:

*Where appropriate, proposals containing new build development (except householder development and housing proposals covered by policy Env 32 below) shall include the provision of good quality, attractive, useable and where appropriate publicly accessible open space that forms at least 20% of the total site area.*

### **Env 32 – Useable Communal Open Space and Private Gardens in Housing Development**

Jennifer Inglis (0437)

No wording specified however it is indicated that this policy should require greenspace rather than open space.

Celia Mainland (0447).

Exact wording is not specified however it is indicated that a definition of greenspace should be provided that precludes artificial surfaces and that this policy should require greenspace rather than just open space.

Archie Clark (0003)

It is stated that this this policy should require more space, however it is also indicated that:

More than 20% of site areas should be useable open space and be cognisant of space requirements for bins and bikes

This policy should apply to existing developments

There should not be option to pay a financial contribution in lieu of providing space on-site.

It is indicated the wording of paragraph 3.153 should be amended so that it is clarified that student accommodation and specialist housing are classed as 'residential' for the time that they are occupied.

Leith Central Community Council (0614)

The circumstances in which contributions shall be permitted in absence of on-site provision should be more clearly defined and have conditions attached.

This policy should set or refer to expected levels of amenity for proposed open spaces and private gardens.

Specify that conversion of front gardens into private parking is not acceptable.

Wright PDL (0078), Melford Development Ltd (0308), Homes for Scotland (0404), S Harrison Developments Limited (0460), Barratt David Wilson Homes (0677), Crosslane Co-Living SPV 2 Limited (0687), Steve Loomes (0767); The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496), HUB Residential (0582), Unite Group (0628), Ambassador Group (0683), Summix Capital Limited (0747), Dandara East Scotland (0757), The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496)

It is indicated that the requirement for 20% open space should be removed. Other representations indicate that the amount of open space required under this policy should be flexible and be cognisant of viability, site context nature of the proposal and uses both existing and proposed.

Crosswind Developments Limited (0184)

Amend policy so that it reads as follows:

*"Housing development will be supported by this policy where it provides good quality, useable open space and/or private gardens as applicable to meet the needs of future residents in line with the requirements below:*

*In developments containing flats where communal provision will be necessary, this will be based on a standard of 10 square metres per flat (excluding any units which are to be provided with adequate\* private gardens). Where justified, developments should seek to achieve up to 20% of total site area as useable open space and/or private gardens. Where development cannot meet the criteria above, a contribution towards the open space and/or green blue network will be negotiated\**

*For housing developments with private gardens, a contribution towards the open space and/or green network will be negotiated if appropriate, having regard to the scale of development proposed and the opportunities of the site and surrounding area".*

Hazledene House Limited (0695)

The specific type and quantity of open space and public realm should be assessed on a case-by-case basis and depending on the site's context.

Melford Development Ltd (0308)

The wording of this policy should be relaxed.

**Summary of responses (including reasons) by planning authority:**

**Env 23 – Open Space Protection**

Archie Clark (0003)

The Council acknowledges this error and will corrected as a typographical change to the Proposed Plan.

Ian Ross (0423)

This would be too sweeping a policy position given there are specific circumstances when development may be appropriate and may, in fact, result in a net betterment in terms of the quality/access to open space provision in an area. **No modification proposed.**

Goff Cantley (0032), Jim Henry (0096), The Friends of Midmar Paddock, Edinburgh (0121)

The term 'significant impact' is considered appropriate for LDP policy which is established in its use in policy terms as suitable the assessment of various impacts in the determination of planning applications against LDP policy.

The footnote relating to criterion b. provides context on walking distances. It is considered appropriate that this specifies publicly accessible open spaces given that the objective of this policy criterion is about ensuring adequate public access to open space rather than retaining open recreational amenity value. There are other policy requirements that are about the other value offered by open space and greenspace which are not specifically linked to public accessibility.

The glossary definition of Green Blue Network in City plan refers to this being the totality of green blue infrastructure in an area. This means smaller, physically unconnected spaces can be considered covered by this criterion.

Specifying a specific distance within which upgrading takes place is not necessary in respect of criterion d. since this criterion states that benefit arising from the development must be 'local'. This is considered adequate. Criterion b. addresses the issue of ensuring a continuation of access to publicly accessible open space and must be met irrespective of the provisions of this criterion so exploitation of criterion d. in the manner set out in representation is addressed by that.

The use of the term of 'Community Purpose' is considered appropriate. It is not practical to specify every use this may cover however it is sufficient for a judgement on this to made by a case by case basis by the decision maker considering the proposal in question.

The development management process makes provision for representations to be made on a given planning application, however, simply making proposals contingent on the support of a sufficient proportion of the local community does not make for clear policy making for guiding development. Moreover it would also be unfair to communities less likely to mount effective, numeric opposition to a proposal despite a space to potentially have significant value to them. Requiring a consultative exercise is also outwith the power of LDPs to specify.

The Council considers this policy, alongside others in the Plan, fully address the importance of green belt, green blue networks and greenspaces as well nature recovery and facilitating biodiversity enhancement.

Draft NPF 4 CD099 Policy 12 addresses themes around the provision and loss of open space as part of green and blue infrastructure. In this regard the Council considers this policy in alignment with NPF4, however City Plan sets out more specific criteria relating to proposals that would result in the loss of open space. The Council acknowledges NPF4 is likely to be adopted soon and once this occurs Reporter(s) may wish to take this into account during Examination.

Regarding the 'loophole' whereby space could be fenced off to prevent it being protected by this policy; that would not work since this policy protects all open space. It is only specific parts of this policy that concern issues of public accessibility. This point also means the Council does not consider there is a conflict regarding Right to Roam legislation. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599),  
Miller Homes Limited (0649)

The walking distances of 400m and 800m for Local Standard or Large Standard spaces respectively are considered important standards for ensuring adequate accessibility since open space is a form of amenity where being able to walk to it is essential to its function. Given that adequate information on this is available in the Council's Open Space Strategy CD066, it is an important standard to set out for more precise and informed policy assessment. It also ensures consistency and alignment of the LDP with the Open Space Strategy's objectives.

The point regarding criteria d. and e. being alternatives is noted, however in combination with the preceding four criteria there are still six in total. Issues of presentation of this are not considered a substantive matter.

The Council considers the modification suggested is not acceptable given it would make criterion a. something which would not have to be complied with rather than it apply in all instances as the Council considers necessary. **No modification proposed.**

Defence Infrastructure Organisation (0124)

It is not practicable for this policy to be tailored for every specific type of applicant/landholder and their particular considerations. **No modification proposed.**

University of Edinburgh (0464)

The change proposed would be too open to interpretation and so make consistent, informed decision making difficult. Criterion e. as proposed is therefore considered appropriate as it is. **No modification proposed.**

Wright PDL (0078), Homes for Scotland (0404)

The Council does not consider that the requirements of this policy are onerous, either individually or cumulatively, however an applicant always has the option of raising and detailing the issue of viability on a case by case basis through the planning application process. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council agrees that open space often plays an important role in defining and enhancing the character of historic areas of the city. Open space also has an important role in terms of the character of other parts of the built environment that are less historic. The Council considers the term environment referred to in criterion a) can be applied to natural and/or built environment. **No modification proposed.**

Russell Gray (0444)

Policy Env 23 provides this protection, in particular criteria a-c require consideration of the values of open space raised in representation. **No modification proposed.**

The following representations have been submitted in support of the policy as proposed:

SEPA (0012), Tessa Haring (0112), Grange/Prestonfield Community Council (0192), The Association for the Protection of Rural Scotland (0334), AREAA (0358), George Kelsey (0386), Scottish Wildlife Trust Lothian Group (0560), Kathryn Poolman (0574), Leith Harbour and Newhaven Community Council (0776)

## **Env 24 – Protection of Outdoor Sports Facilities**

Archie Clark (0003)

Paragraph 3.195 supporting Policy Inf 1 ‘Access to Community Facilities’ addresses 20 minute neighbourhoods. It sets out sport and recreation as types of facilities that are important for community life and should be provided by new development where appropriate to address existing shortfalls. **No modification proposed.**

Wright PDL (0078), Homes for Scotland (0404), Barratt David Wilson Homes (0677), Steve Loomes (0767)

The Council has information on sports provision as well as consulting internally and externally (for example with SportScotland) to help the decision maker on a given application come to an informed judgement about whether there is an excess of sports provision in an area as well as current and future demand. **No modification proposed.**

Defence Infrastructure Organisation (0124)

It is not practicable for this policy to be tailored for every specific type of applicant/landholder and their particular considerations. **No modification proposed.**

University of Edinburgh (0464)

The change proposed would be too open to interpretation and so make consistent, informed decision making difficult. **No modification proposed.**

SportScotland (0671)

The errors in the footnote paragraph will be corrected as a typographical change.

The Council acknowledges there is technical error in respect of the footnote and that these should be corrected as a minor drafting/technical matter.

The Council considers the substantive policy requirements of criterion d. to be in alignment with the corresponding fourth criterion of Policy 12 e. of SPP CD096 para. 260 and draft NPF 4 CD099. There is a small degree of difference in the wording in criterion c) of Env 24 and the third bullet point of SPP para. 260 and draft NPF 4 Policy 12, criterion e). The Council does not consider the divergence to be significant. No modification proposed, however, the Council acknowledges NPF4 is likely to be adopted soon and once this occurs Reporter(s) may wish to take this into account during Examination.

The following representations have been submitted in support of the policy as proposed:

Philip Endecott (0079), Grange/Prestonfield Community Council (0192)  
The Association for the Protection of Rural Scotland (0334), George Kelsey (0386),  
Kathryn Poolman (0574), Scottish Wildlife Trust Lothian Group (0560), James Forbes  
(0647), RSPB (0648)

## **Env 31 – Useable Open Space in New Developments**

Celia Mainland (0447), James Forbes (0647)

A definition of Greenspace is provided in the Glossary of City Plan. This states the definition relates to 'Any vegetated land or structure, water or geological feature in the urban area including playing fields, grassed areas, trees, woodlands and paths.' **No modification proposed.**

Jennifer Inglis (0437)

The Council considers open spaces of a non-vegetated variety can provide amenity value if designed appropriately, however it is noted that there are a range of other Environment policies applicable to proposals, for example Env 6 'Green Blue Infrastructure', which this policy will need to be read in conjunction with. The net effect of the policies of City Plan will ensure new developments provide adequate greener, sustainable places. **No modification proposed.**

Archie Clark (0003)



The current LDP adopted in 2016 applies a standard of 20% in certain circumstances for residential developments. The historic position prior to this of less direct relevance. Notwithstanding this, 20% is considered a reasonable level to provide a balance between delivering development itself whilst also providing amenity and a high quality of environment on site and for the surrounding area.

It is not the role of LDP's to apply standards retrospectively to existing development.

The policy states that it 'may' be possible for applicants to make a financial contribution in lieu of on-site provision, however the Council would have to assess if this was appropriate in the circumstance in question rather than it simply being a matter of preference for the applicant. **No modification proposed.**

Wright PDL (0078), Melford Development Ltd (0308), Homes for Scotland (0404), S Harrison Developments Limited (0460), Barratt David Wilson Homes (0677), Crosslane Co-Living SPV 2 Limited (0687), Steve Loomes (0767); The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496), HUB Residential (0582), Unite Group (0628), Ambassador Group (0683), Summix Capital Limited (0747), Dandara East Scotland (0757).

20% is considered a reasonable level to provide a balance between delivering development itself whilst also providing amenity and a high quality of environment on site and for the surrounding area. It is not considered this will make developments unviable and is commensurate with the level required under existing LDP CD039 policy Hou 3 for residential development.

The Council does not consider this policy requirement will render developments unviable, either individually or cumulatively with other policy requirements, however applicants are able to raise the issue of viability as part of an application if they consider the particular circumstances merit it.

20% is considered deliverable and generally compatible with density requirements set out in this Plan. Further discussion on issues around density and compatibility with other requirements of City Plan are addressed in 'Issue 12: Density'. **No modification proposed.**

Melford Development Ltd (0308), The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496)

The provision of space on-site or contributions in lieu of this is directly relevant to the provision of general non-residential development. It is an essential part of achieving a positive urban realm and delivering on placemaking and environmental objectives which all development addressed by this plan should deliver. As such the policy is considered compliant with Planning Circular 3/2012 CD117 in meeting the 'relationship to the proposed development test'. Clearly there is a need for any individual obligation and contribution to be proportionate, however, the policy as set out here does not pose any problems in meeting this test. The requirement for a 20% figure for on-site provision sets a consistent and proportionate baseline from which a mitigating contribution would be necessary to off-set any shortfall in such on-site provision. **No modification proposed.**

Watkin Jones Group (0516), Summix Capital Limited (0747), Unite Group plc (0628)

This policy does not set out a need for play space provision and Policy Env 31 acknowledges there are some differences between residential and non-residential development in respect of open space provision.

Student accommodation is still considered to need to provide the same level of open space as other non-residential development for the reasons above relating to the delivery of the strategy objectives of this plan. This includes providing outdoor amenity space for students since outdoor amenity space provides health and wellbeing benefits that cannot be fully replicated in indoor communal areas, such as exposure to nature and sunlight. It also provides for the future adaptability of that accommodation. **No modification proposed.**

#### NHS Lothian (0596)

Paragraph 3.156 sets out the need for open space to be accessible for everyone, though this text is in support of Policy Env 32 rather than this Policy Env 31. No modification proposed, however, should the Reporter be so minded that greater clarity is needed then the Council would not see issue in a modification to move paragraphs 3.156, 3.158 and 3.159 to follow on immediately after paragraph 3.154 so as to proceed both Env 31 and 32.

#### Edinburgh Airport Limited (0761)

If there are locationally specific reasons why a developer or land-owner considers the policy should not apply then this can be raised in a particular application however it is not the place of this policy to consider making provision for each circumstance that might apply. **No modification proposed.**

The following representations have been submitted in support of the policy as proposed: SEPA (0012), Grange/Prestonfield Community Council (0192), Stirling Developments Limited (0303) Pawel Stankiewicz (0445), NatureScot (0528), Scottish Wildlife Trust Lothian group (0560), James Forbes (0647), RSPB (0648)

### **Env 32 - Useable Communal Open Space and Private Gardens in Housing Developments**

#### Celia Mainland (0447)

A definition of Greenspace is provided in the Glossary of City Plan. This states the definition relates to 'Any vegetated land or structure, water or geological feature in the urban area including playing fields, grassed areas, trees, woodlands and paths.' **No modification proposed.**

#### Jennifer Inglis (0437)

The Council considers open spaces of a non-vegetated variety can provide amenity value if designed appropriately, however it is noted that there are a range of other Environment policies applicable to proposals, for example Env 6 'Green Blue Infrastructure', which this policy will need to be read in conjunction with. The net effect of the policies of City Plan

will ensure new developments provide adequate greener, sustainable places. **No modification proposed.**

Archie Clark (0003)

The current LDP adopted in 2016 applies a standard of 20% in certain circumstances for residential developments. The historic position prior to this of less direct relevance. Notwithstanding this, 20% is considered a reasonable level to provide a balance between delivering development itself whilst also providing amenity and a high quality of environment on site and for the surrounding area.

It is not the role of LDPs to apply standards retrospectively to existing development.

The policy states that it 'may' be possible for applicants to make a financial contribution in lieu of on-site provision, however the Council would have to assess if this was appropriate in the circumstance in question rather than it simply being a matter of preference for the applicant.

The decision maker of an application will assess what areas contribute towards open space. It would be expected that site layouts show bin storage areas and this would mean the decision maker can come to an informed judgement about what areas they consider comprise open space.

The Council considers that paragraph 3.153 is appropriate in stating that student accommodation and specialist housing should be addressed as part of Env 31 relating to general new development, rather than Env 31 relating to residential development. Requirements for open space in these types of development should typically be communal rather than private gardens for individual homes. **No modification proposed.**

Leith Central Community Council (0614)

The Council considers it appropriate that the decision maker assess when, and to what extent, contributions may be acceptable in lieu of on-site provision. The policy sets out considerations for assessment, in particular the existing opportunities in the surrounding area.

Policy Env 33 (amenity) sets out further details on level of amenity expected, with this covering space standards for future occupiers. Guidance expands on this further. The Council considers it unnecessary to duplicate this in Policy Env 32.

Policy Env 5 (Alternations, Extensions and Domestic Outbuildings) addresses domestic scale proposals. Proposed driveways in existing properties are more fully addressed in Edinburgh's 'Guidance for Householders'. The Council considers this has an appropriate balance for when the formation of driveways is acceptable and this is reviewed regularly to ensure it remains fit for purpose. **No modification proposed.**

Wright PDL (0078), Melford Development Ltd (0308), Homes for Scotland (0404), S Harrison Developments Limited (0460), Barratt David Wilson Homes (0677), Crosslane Co-Living SPV 2 Limited (0687), Steve Loomes (0767); The Royal London Mutual Insurance Society Ltd (0149), Forth Ports Limited (0496), HUB Residential (0582), Unite Group (0628), Ambassador Group (0683), Summix Capital Limited (0747), Dandara East

Scotland (0757), Crosswind Developments Limited (0184), Hazledene House Limited (0695)

20% is considered a reasonable level to provide a balance between delivering development itself whilst also providing amenity and a high quality of environment on site and for the surrounding area. It is not considered this will make developments unviable and is commensurate with the level required under existing LDP CD039 policy Hou 3 for residential development.

The Council does not consider this policy requirement will render developments unviable, either individually or cumulatively with other policy requirements, however applicants are able to raise the issue of viability as part of an application if they consider the particular circumstances merit it.

20% is considered deliverable and generally compatible with density requirements set out in this Plan. Further discussion on issues around density and compatibility with other requirements of City Plan are addressed in 'Issue 12: Density'. **No modification proposed.**

Crosswind Developments Limited (0184)

The modification proposed in this representation is too equivocal on the requirement for 20% of the site area to be useable open space and/or private gardens. The policy puts the emphasis on the Council to justify why a development needs to provide open space rather than an applicant demonstrating why they should not. This is not the approach LDP policy should take in order to provide certainty in how the Council considers the form development should take.

**No modification proposed.**

The following representations have been submitted in support of the policy as proposed:

SEPA (0012), Grange/Prestonfield Community Council (0192),  
Stirling Developments Limited (0303), Pawel Stankiewicz (0445), Scottish Wildlife Trust  
Lothian group (0560), RSPB (0648)

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 18	Blue Green network proposals	
Development plan reference:	Part 4 Table 1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Alexander Dunn (0506) Alistair Chalmers (0609) AMA (New Town) Ltd (0446) Andrew Brown (0007) Andrew Shiells (0803) Andy Inglis (0138) Archie Clark (0003) Archie Rose (0380) Astley Ainslie Community Engagement Group (AACEG) (0275) Biffa (0804) Brighthouse Park Owners Association (0607) C Wright (0553) Colin Crichton (0068), Cramond & Barnton Community Council (0243) Cramond Primary School (0341) Crosswind Developments Ltd (0184) Diane McCutcheon (0107) Edinburgh Airport Limited (0761) Elanor Cameron (0764) Forth Ports Limited (0496) Gavin Cameron (0782) Grange/Prestonfield Community Council (0192) Helen MacLeod (0364) Hillside Leisure Ltd (0080) Ian R N Stewart (0131) J B Michael Dick & Mrs Helen M Dick (0338) Jamie Halstead (0434), Jan Hume (0420) Joanna McColm (0139) Joanne Macleod (0177), John & Maureen Pope (0347)	Juniper Green and Baberton Mains Community Council (0306) Liberton and District Community Council (0084) Louise Baker (0773) Louise Halstad (0433), Lucile Cruikshand (0783) Michael Ramsay (0011) Mr John K Skinner (0065), Murrayfield Community Council (0146) Naomi Appleton (0271) NatureScot (0528) Neil Ross (0610) Nicola Archer (0110) Oliver Macintyre (0019) Paul Kleiser (0126) Ratho and District Community Council (0289) Richard Bright (0627) Robyn Kane (0091) SEPA (0012) Shona Morland (0769) Sportscotland (0671) Stockbridge and Inverleith Community Council (0741) Sue Fernandes (0128) The Davidson's Mains and Silverknowes Association (0454) The Friends of Inverleith Park (0459) The Woodland Trust (0774) Timothy Chares Hanson Sale (0190), Tom Davidson (0453) Ursula Wright (0662) West Town Edinburgh Ltd (0660) William Brotherston (0754)	
Provision of the development plan to which the issue relates:	Blue Green Network Proposals	
Planning authority's summary of the representation(s):		

## **Promoted Blue Green Network proposals**

### Andy Inglis (0138)

Too few proposals and these are of insufficient size and ambition. More space needs to be given to greenspace rather than for it be contained in small areas. The plan fails to recognise the part other species play in the survival of humans.

### Archie Clark (0003)

Parts of the greenbelt appear non existent or are so vulnerable eg Balerno, they could easily be breached.

No reference to cemeteries.

### Hillside Leisure Ltd (0080)

The Proposed Plan does not include the Pentlands Trail Centre, which is an important proposal. It will help the plan deliver the objective of 'protecting and enhancing blue and green infrastructure' by creating new linkages from the city to the Pentlands and planting and managing existing woodland.

This supports the Million Trees initiative and Forum through, with a substantial level of phased replenishment work is required to ensure the longevity of the woodland. Without this it is possible that the woodland would continue to fail as demonstrated by an appropriate survey noting that the loss of trees is acceptable due to their poor condition and appropriate replacement of any lost trees is necessary.

### Cramond & Barnton Community Council (0243), Michael Ramsay (0011)

Add Lauriston Farm Community based Agro-ecology Project site as a Green Blue Network proposal. The site is located at Lauriston Castle farmland and is approximately bounded by Cramond Road North, Lauriston Castle parkland, Lauriston Farm Road, Silverknowes Road (North) and Marine Drive.

City Plan should identify potential sites for allotments (e.g. Green Belt between Cammo Estate LNR and Craigs Road). This would encourage provision for, and development of, allotments and other community food growing spaces is an essential element to achieve sustainability, net zero (e.g. reduction in food miles) and community health objectives.

### Murrayfield Community Council (0146)

90 people have expressed a desire for allotments at Balgreen Park however the Plan does not make provision for this.

### Jan Hume (0420)

The Royal Edinburgh Hospital is an important, if small, site as it is the only green space in the vicinity of Morningside Road to the west of Morningside Road. Its sympathetic management will enhance biodiversity and attractiveness as a green space which can

contribute to the well-being of both patients and the local community. On a small site, major new construction and increased building footprint may already have been approved - which makes it more important than ever that ingenuity and environmental respect are brought to bear on a vision for the remaining land and its curation and management.

Ursula Wright (0662), Louise Baker (0773), Helen MacLeod (0364)

There is inadequate provision for any allotments, community gardens and orchards for residents. This is despite the benefits this would have for the productivity of open space, reducing emissions and packing, ecology, health, community learning and engagement practice with increased activity and interaction opportunities – especially in new development areas. In addition, if residents feel ownership they will care for area and preserves its original ethos. This plan also does not encourage food growing in private gardens despite this having many of the above benefits.

Ursula Wright (0662)

This lack of growing space and allotments is particularly evident in Seafield.

William Brotherston (0754)

The nearby Lang Linn path from the back of Blackford Hill and the Hermitage of Braid to the Braid Hills has been neglected and allowed to fall into disrepair. The railings that used to line it were removed by the contractors making the now defunct children's golf course and never replaced, and the path has sometimes been used as a dump e.g. for large hay bales.

Juniper Green and Baberton Mains Community Council (0306)

It is indicated that a site at the Muir Wood Field in Currie should be included in the Proposed Plan given the strategic importance of open space for space in this area and to contribute to the 20 minute neighbourhood concept. To this end a core path should also be provided along the north side of the space also. This would be in line with the longstanding aims of the Council for this land and which was stated in relation to a public enquiry P/PPA/230/242.

Michael Ramsay (0011)

Support the extension of the River Almond Walkway to Kirkliston

### **Comments across multiple BGN proposals**

SEPA (0012)

BGN4, BGN5, BGN6, BGN8, BGN9, BGN10, BGN11, BGN12, BGN14, BGN14, BGN15, BGN16, BGN18: these proposals should state that blue green infrastructure should be multifunctional and connect to wider green-blue network.

BGN 2, BGN 7, BGN 25-BGN 47 and BGN 50-57: potential to connect to the wider green blue network and to incorporate elements of blue-green infrastructure, including slowing

and filtering rainwater and providing greater local biodiversity in their layout and planting. Emphasise that blue green infrastructure should be multifunctional and connect to wider green-blue network. Also draw attention to Sustainable Rainwater Guidance once this is available.

### **Strategic Green Blue Network**

#### NatureScot (0528)

It is difficult to relate the green blue network to proposed and existing development. The focus on mapped data rather than specific places, safeguarded assets and proposed connections means that few identifiable and place specific opportunities for expanding and enhancing the city's green blue network are identified and shown in the Proposed Plan's Proposals Map.

### **BGN 1 Inch Nursery and Park**

#### Grange/Prestonfield Community Council (0192)

This proposal must be integrated with proposed extra Place based Policy "Cameron Toll" in view of shopping centre redevelopment including housing etc.

#### The Woodland Trust (0774)

Add a native tree element to this proposal if this does not exist already.

#### Robyn Kane (0091)

Leave Inch Park as it is. Do not build on it.

#### SEPA (0012)

Should refer to the importance of parks in water management and implementation in the City's Water Vision. In particular advise of the need for multi-faceted use in zoning. The importance of use being determined by weather conditions if park space is to contribute to adaptative response to future fitting place should be stressed.

### **BGN 2 – Leith Links**

#### SEPA (0012)

Draw attention to the potential for restoration of the Water of Leith. We recognise this is a complex catchment with flood scheme infrastructure, UNESCO designation and amenity access, with several large weirs which act as barriers to fish movement. Initial scoping has been recently completed and discussions, with Water of Leith Conversation Trust and all interested parties will review these results over 2022. SEPA will work with all other partners to achieve what is possible.

### **BGN 3 Inverleith Depot**



The Friends of Inverleith Park (0459), Stockbridge and Inverleith Community Council (0741)

The reference to Inverleith park and depot in BGN3 is NOT equivalent to the corresponding Adopted LDP 2016 designation (GS8) as it does NOT protect the depot area from development as the depot area is classified as white Urban Space and not green Open Space like the rest of the park.

Inch Park has a substantially bigger depot than this site and it does not have its depot area differentiated from the rest of the park. That is the correct approach. Why should a different approach be taken to Inverleith?

The Inverleith depot has large areas of green vegetation – it is not an urban type space.

In both the recent and more historic past the Council has given inconsistent positions on whether it will protect the depot from development and consider it as greenspace as part of the overall park. Designating the depot as greenspace will ensure any change of personnel will not put the depot area at risk of housing development. The depot should be considered part of the park as shown in the original minutes of the decision in 1891 to buy the land for the park from the Rocheid Estate. The Council minute of 1891 said that this land was essential as part of the park.

Current LDP proposal GS8 which proposes the conversion of the depot into greenspace better protects the depot and reflects the position agreed with the Minister of the Environment that was incorporated into LDP 2016

SEPA (0012)

Current work in this area to support future fitting water management and climate adaptation needs to be considered in the development and implementation of this proposal.

Naomi Appleton (0271)

Flooding frequently cuts off access through the park and makes the green areas unusable.

Those of us without dogs would appreciate a space where dogs must be kept on leads. This park is particularly problematic in terms of random dogs jumping up at you, which scares children (and some adults) and gets us all unnecessarily muddy.

**BGN 7 - Little France**

SEPA (0012)

There is the potential to incorporate the proposed restoration of Burdiehouse Burn as part of restoration and regeneration project involving Edinburgh and Lothians Green Space Trust/Scottish Wildlife Trust/SEPA and other partners.

**BGN 17 - Murrayburn Road**

Archie Clark (0003)

What is meant by the development principle relating to the Murray Burn?

SEPA (0012)

SEPA has completed initial scoping of opportunities to improve the physical condition of this waterbody and consider this work could add considerable amenity benefits enhancing areas of green space for the local communities in Longstone and Wester Hailes areas of the city. Restoration potential has been identified in between Longstone Road and Murray Burn-Water of Leith confluence and to the West of the Western Hailes Education Centre. There would be the potential in these to improve the river environment as well create greenspaces and active travel route which could be enjoyed by the local community.

**BGN 19 - Gorgie Road (east)**

SEPA (0012)

This proposal needs to be clarified or rather the SFRA needs to be amended. No flood risk assessment (FRA) is requested in Appendix D which does not equate with the suggestion here to open up a natural watercourse. While we welcome de-culverting and the naturalisation of watercourses, an FRA will be needed to inform development.

**BGN 20 - Crewe Road South**

Shona Morland (0769), Ian R N Stewart (0131)

It is important this proposal is carried out prior to any development work to avoid the problem occurring prior to the water table being affected by additional building.

**BGN 21 – South Fort Street**

SEPA (0012)

Ask that proposal is clarified. As it is written it could be read that built development should avoid the 20m buffer and that is all that is needed.

**BGN 22 – Royal Victoria Hospital**

Ian R N Stewart (0131)

Consider this site for a new school/community buildings.

**BGN 23 – Astley Ainsley Hospital**

Neil Ross (0610)

There should be a wider buffer along the Jordan Burn.

Astley Ainslie Community Engagement Group (AACEG) (0275)

Concerns around tree loss given the importance of these and the risk of harm given the work proposed.

## **BGN 24 - Granton Waterfront Coastal Park**

Biffa (0804)

This is undeliverable without displacing and relocating the occupiers of the West Shore Trading Estate at great expense. It is clearly unsustainable and not economically viable to demolish an operational waste management facility, along with the neighbouring premises, and develop new facilities at alternative sites which are not available.

## **BGN 26 – Cramond Road North**

Paul Kleiser (0126), Lucile Cruikshand (0783)

Do not allow possibility of housing development as part of this proposal. The site should be a quiet, green open community space for families and children.

Lucile Cruikshand (0783)

It should not be used for further housing developments

Richard Bright (0627)

It is critical that this area is to be used and maintained as accessible community open space *by* and *for* local people

AMA (New Town) Ltd (0446)

AMA has marketed the site and engaged in discussions with extensive sports clubs and providers to try and bring forward sports provision on the site in line with existing planning permission 01/01881/FUL and the Cramond Campus Planning Brief. AMA is undertaking engagement with the local community on a route map for the delivery and nature of the sport facilities and open space. This is as part of Section 42 application 20/02916/FUL which is seeking an extension to the timescale for delivering the sports provision.

AMA is concerned this proposal and allocation for a large green space standard of 2 hectares on the site is premature while sports/open space options for the site are still being considered/advanced and does not fully take into account the site's planning history.

AMA are also unclear how possible sports provision options would align with the 2 hectares large open space standard set out in this proposal. For example, the three minded to grant permissions for different combinations of sports provision for the site (which were previously accepted by the Council and are in accordance with the Brief) do not appear to align with this designation.

This space is currently fenced off for safety purposes. It does not yet provide any publicly accessible open space.

Sportscotland (0671)

The current planning permission for the site includes sports facilities.

The Davidson's Mains and Silverknowes Association (0454)

This proposal is not compatible with proposals to lease the site to the Agri Eco Co-Operative for organic food growing and some tree planting. The Agri Eco proposals are welcomed and supported. The site will be accessible to the public with a network of pathways around the site and towards Silverknowes and the foreshore

**BGN 29 Craiglockhart**

SEPA (0012)

Discharging surface water to the canal is referenced in the SFRA.

**BGN 36 Royal Victoria Hospital**

SEPA (0012)

Refer to BGN22 and ask if these should be separate.

**BGN 37 - Orchard Brae Avenue**

Ian R N Stewart (0131)

Consider this site for a new school/community buildings.

SEPA (0012)

Believes there are opportunities here to manage surface water more effectively. Managing water would begin the process of incremental improvements to benefit the areas at the foot of the hill where there are problems with surface water management.

**BGN 38 - Duddingston Park South**

SEPA (0012)

Initial scoping has been completed on Braid Burn identifying huge amenity benefits and value. Undertaking restoration work in these areas would significantly improve the biodiversity along the channel in addition to improving the amenity of area. Smaller measures to improve habitat diversity could also be undertaken within Braids Valley Park, The Hermitage and Figgate Park. Although, it is recognised that further flood walls or embankments may be proposed along the burn to reduce flood risk, ask that these are set-back as far as possible from bank top to maintain the physical character and ecological value of the burn as much as possible.

**BGN 42 - Balgreen Park**

SEPA (0012)

Mentions green/blue in the table 'type' but no details in the 'description'.

**BGN 44 Leith Western Harbour Central Park Western Harbour EW1a**

Forth Ports Limited (0496)

The site area of 5.2ha stated in the plan is incorrect. Development of the Western Harbour Park has commenced and it has a site area of 4.4 ha in line with permission 19/01040/AMC

SEPA (0012)

Mentions green/blue in the table 'type' but no details in the 'description'.

**BGN 46 South East Wedge Parkland (Little France Park)**

SEPA (0012)

There is considerable potential to incorporate into the proposed restoration of Burdiehouse Burn as part of restoration and regeneration project involving Edinburgh and Lothians Green Space Trust/Scottish Wildlife Trust/SEPA and other partners.

**BGN 48 - W. Edinburgh Blue Green Network**

Ratho and District Community Council (0289)

The Blue Green network does not take into account the necessity to ensure there is no standing water to encourage roosting birds within the Edinburgh Airport Safety Zone

The Davidson's Mains and Silverknowes Association (0454)

It needs to be recognised that the open space at Silverknowes between Cramond and Granton is an essential element of the network. The omission is demonstrated on the spatial plan on map 1 on page 9 of the document

NatureScot (0528)

West Edinburgh represents an opportunity to address strategic issues, particularly north-south green blue network connections that are currently weak and/or underdeveloped. The inter-relationship between sites in the wider West Edinburgh area are important, particularly how sites identified as 'West Edinburgh' in the Proposed Plan relate to each other to create a new 20 minute neighbourhood and also deliver functions for the other areas identified in paragraph 3.53 (page 71)

The focus on play facilities and open space and on particular ecosystem services during preparation also means that connectivity and multi-functionality are not ensured. The green blue network as currently shown will not safeguard existing network assets and enhance key networks and wider links.

**BGN 49 (Gogar Burn)**

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

The benefits of the proposal and the extent of buffer zone have not been evidenced or qualified and nor have metrics agreed for measuring them.

Details have not been provided of the exact costs and delivery mechanism.

In this regard there will not be a benefit as any diversion or restoration of the Gogar Burn would need to be culverted and further mitigation would also be required, for example with netting put in place to prevent attracting wildlife. No standing water could be allowed given potential to encourage roosting birds.

This lack of benefit would be significantly outweighed by the very high cost of around £10 million, further cost for land acquisition and the lost development potential of this land.

This route has not yet been proven to be viable.

There has been inadequate consultation with landowners (including Edinburgh Airport) undertaken despite the significant impact on them.

The proposals do not reflect ongoing concerns in relation to land ownership

Potential to increase bird strike risk, with potential to create flight lines for birds between water bodies through the critical approach and landing corridors. The risk in such critical areas of airspace is too great to manage safely as there is no effective way to manage or deter the risk. Flight safety would be compromised as ultimately wildlife strikes can result in aircraft damage and possible fatalities. The Council has not undertaken and/or provided evidence assessing safety impact.

It is unreasonable to expect such a large buffer zone which will cut the Crosswind development site in two based on the indicative location for the re-routing of the burn on the proposals map. There is not space within the airport's grounds for such a wide buffer zone either.

The proposal would require significant earthworks and ground raising so levels would be created higher than the end of the runway. A channel with embankments to form a 5m deep burn to flow into the River Almond would be required, which is not a practical solution. A section of twin culverts is a more realistic engineering proposal for this area, notwithstanding the bird strike issue, given the shallow hydraulic gradients and flooding issues. However, this would not improve the geomorphological status of the burn.

The existing Gogar Burn has over 15 surface water outfalls discharging into it from the airport, in addition to several others from City of Edinburgh Council roads and private buildings. The 20 km of surface water networks discharging to the burn represent enormous infrastructure costs invested. These cannot be diverted to the proposed new route due to gradient issues. Consequently, the existing burn and Gogar culvert would need to be retained as a surface water system discharging to the River Almond, should the upper section be diverted.

The Gogar Burn diversion through CDL and Edinburgh Airport land is shown on Map 2 and referenced in the key, but none of the other Table 1 proposals are given such a reference. This is disproportionate. The Spatial Strategy is not the place to illustrate such

a proposal. No other water courses are illustrated, and other route diversions are not illustrated i.e. at Edinburgh Park / Garden District.

West Town Edinburgh Ltd (0660)

The proposed re-alignment of the burn should be removed as a proposal. If it is included however then it should be noted that the current route will remain an outlet for sustainable water management purposes if/when the proposal proceeds.

Ratho and District Community Council (0289)

These proposals cannot include any standing water due to airport safeguarding.

SEPA (0012)

If this proposal was linked or incorporated into BGN 46, however, it could be part of a much more dynamic and interesting place and form a more extensive part of the city's green/blue infrastructure.

**BGN 52 - Edinburgh 205**

SEPA (0012)

Site could be linked to BGN 49 and be part of a much more dynamic and interesting place and form a more extensive part of the city's green/blue infrastructure.

**BGN 53 - Turnhouse Road**

SEPA (0012)

Potential to incorporate elements of blue-green infrastructure should be included, not least to be part of a system that slows and filters rainwater to avoid the inundation of sewers, drains and watercourses. These areas could also be considered in terms of their potential to provide greater local biodiversity in their layout and planting

**BGN 54 - Turnhouse Road (SAICA)**

SEPA (0012)

Potential to incorporate elements of blue-green infrastructure should be included, not least to be part of a system that slows and filters rainwater to avoid the inundation of sewers, drains and watercourses. These areas could also be considered in terms of their potential to provide greater local biodiversity in their layout and planting

**BGN 56 - Land adj. to Edinburgh Gateway**

SEPA (0012)

Please see our comments on Proposal BGN 49.

**BGN 57 (Seafield)**

## SEPA (0012)

Potential to incorporate elements of blue-green infrastructure should be included, not least to be part of a system that slows and filters rainwater to avoid the inundation of sewers, drains and watercourses. These areas could also be considered in terms of their potential to provide greater local biodiversity in their layout and planting

## **Modifications sought by those submitting representations:**

### **Promoted Blue Green Network proposals**

#### Andy Inglis (0138)

Designate Holyrood Park a National Park and let it grow wild. \*Then\* there will be biodiversity. It is also indicated the Spatial Strategy should be more emphatic in recognising the need to give over greater areas to genuine rewilding, particularly paras. 2.57 and 2.72.

#### Archie Clark (0003)

No modification specified however it is indicated that proposals should be introduced to reinforce the Green belt and to expand cemetery provision.

#### Hillside Leisure Ltd (0080)

The Pentland Trail Centre (PTC) site should be allocated as a potential outdoor leisure recreation facility will further help to promote the Pentland Hills as a beautiful multi-use green space and with a particular focus on the future health and well-being of the population of Edinburgh, Midlothian and further afield.

A starting point will be the future management and phased re-planting of the "T-wood" on the higher slopes of the proposed PTC, located north of Caerketton Hill and immediately west of the ski centre.

The proposal would provide an opportunity to further extend the Strategic Active Travel project and safeguard of reference ATSR3, the 'Pentlands to Portobello Link' shown by the map on Page 31 of City Plan, and included in Table 3 on page 166 of City Plan and to extend green and blue networks from the city into the Pentland Hills.

#### Cramond & Barnton Community Council (0243), Michael Ramsay (0011)

Add Lauriston Farm Community based Agro-ecology Project site as a Green Blue Network proposal.

City Plan should identify potential sites for allotments (e.g. Green Belt between Cammo Estate LNR and Craigs Road).

#### William Brotherston (0754)



The Lang Linn should be properly re-instated as an important connection between Blackford Hill and the Braids.

With reference to the defunct children's golf course, could some other use be found for it e.g. for allotments of which there are do not seem to be many on the south side of Edinburgh?

Louise Baker (0773)

No specific wording proposed but it is indicated existing and proposed projects akin to the Granton Community Gardeners should be included in the plan. Projects such as Grass Roots Remedies Co-op also play an important role in the health of communities and should be supported.

Murrayfield Community Council (0146)

Balgreen Park should be designated for allotments

Jan Hume (0420)

No specific modifications specified but it is indicated a proposal should be added to the plan for The Royal Edinburgh Hospital to ensure its current landscape could be restored and improved.

Ursula Wright (0662), Louise Baker (0773), Helen MacLeod (0364)

It is indicated that there should be more proposals for community gardens and allotments across the City.

Ursula Wright (0662)

It is indicated that there should be more proposals for community gardens and allotments particularly in the Seafield area.

Louise Baker (0773)

There should be greater encouragement of private food growing in addition to allotments, community orchards and growing areas. Existing projects such as the Granton Community Gardeners and Grass Roots Remedies Co-op should be supported.

Juniper Green and Baberton Mains Community Council (0306)

No specific modification stated but it is indicated that a site at the Muir Wood Field in Currie should be included in the Proposed Plan.

Michael Ramsay (0011)

It is indicated that the extension of the River Almond Walkway to Kirkliston should be included as a proposal.

**Comments across multiple BGN proposals**

#### SEPA (0012)

BGN4, BGN5, BGN6, BGN8, BGN9, BGN10, BGN11, BGN12, BGN14, BGN14, BGN15, BGN16, BGN18: these proposals should state that blue green infrastructure should be multifunctional and connect to wider green-blue network.

BGN 2, BGN 7, BGN 25-BGN 47 and BGN 50-57: potential to connect to the wider green blue network and to incorporate elements of blue-green infrastructure. Also draw attention to Sustainable Rainwater Guidance once this is available

### **Strategic Green Blue Network**

#### NatureScot (0528)

No modifications specified however it is indicated that a revised strategic blue green network should be produced with a different methodology and that this should inform and identify a greater number of opportunities for expanding and enhancing the city's green blue network.

### **BGN 1 Inch nursery and Park**

#### Grange/Prestonfield Community Council (0192)

This proposal must be integrated with proposed extra Place based Policy "Cameron Toll".

#### The Woodland Trust (0774)

Add a native tree element to this proposal if this does not exist already.

#### Robyn Kane (0091)

Leave Inch Park as it is. Do not build on it.

#### SEPA (0012)

Should refer to the importance of parks in water management and implementation in the City's Water Vision.

### **BGN 2 Leith Links**

#### SEPA (0012)

It is indicated that the proposal should incorporate flood storage within green space along the Leith Links Active Travel route, green roofing on bus shelters/potential for green walling. The proposal should also consider the potential for restoration of the Water of Leith.

### **BGN 3 Inverleith Depot**

The Friends of Inverleith Park (0459), Stockbridge and Inverleith Community Council (0741)

Update BGN3 wording on Inverleith Park and to correct the Proposals Map so that the whole area of the park including the depot is classified as open green space which will ensure that the land in the area called the depot remains as protected as possible.

The Park Improvement Plan has already been started which should be altered in the proposal.

Naomi Appleton (0271)

It is indicated that this proposal should address flooding and have some parts could be specifically for dogs off leads and some parts not.

SEPA (0012)

No modification specified but it is indicated that current work in this area to support future fitting water management and climate adaptation needs should be considered in the development and implementation of this proposal.

#### **BGN 7 - Little France**

SEPA (0012)

This proposal should incorporate the proposed restoration of Burdiehouse Burn.

#### **BGN 17 - Murrayburn Road**

Archie Clark (0003)

Clarity needed on what is meant by the development principle relating to the Murray Burn.

SEPA (0012)

It is indicated that the proposal should incorporate the waterbody restoration opportunities scoping work. This proposal should also implement City Mobility Plan, build into active and public transport, provide green roofs, SUDS, improve housing stock, harness renewables, reduce emissions and inequalities

#### **BGN 19 - Gorgie Road (east)**

SEPA (0012)

It is indicated that it should be stated an FRA shall be needed in connection with this proposal.

#### **BGN 20 - Crewe Road South**

Shona Morland (0769), Ian R N Stewart (0131)

City Plan should ensure this will be carried out prior to any development work.

Ian R N Stewart (0131)

Consider this site for a new school/community buildings.

**BGN 21 – South Fort Street**

SEPA (0012)

A flood risk assessment should be used to inform the buffer as well as well as the location of any housing.

**BGN 22 – Royal Victoria Hospital**

Ian R N Stewart (0131)

It is indicated this site should accommodate new school/community buildings.

**BGN 23 – Astley Ainsley Hospital**

Neil Ross (0610)

No wording specified however it is indicated that there should be a wider buffer along the Jordan Burn.

Astley Ainslie Community Engagement Group (AACEG) (0275)

At the end of first paragraph add “New building and digging of trenches should avoid the root protection area of the established trees.”

**BGN 24- Granton Waterfront Coastal Park**

Biffa (0804)

Indicated that this proposal should be deleted.

**BGN 26 – Cramond Road North**

Paul Kleiser (0126), Lucile Cruikshand (0783)

Do not allow possibility of housing development as part of this proposal.

Richard Bright (0627)

City Plan should state this area is to be able to used and maintained as accessible community open space *by* and *for* local people

AMA (New Town) Ltd (0446)

The BGN 26 Cramond Road designation should be removed from the plan and the area returned to “white land” in the urban area as per its designation in the Edinburgh Local Development Plan 2016; with the requirement for this site to deliver sports provision/open

space set out by the original Cramond Campus Brief, permission 01/01881/FUL and the Sports Management Plan approved under condition 13 of the aforementioned permission.

Sportscotland (0671)

It is indicated that the proposal should include a reference for the need for replacement sports facilities as per the current planning permission for the site.

The Davidson's Mains and Silverknowes Association (0454)

No wording is specified however it is indicated that the proposal should be modified to align with proposals by Agri Eco Co-Operative for organic food growing and some tree planting.

**BGN 29 Craiglockhart**

SEPA (0012)

The Council should consider specify that surface water should be discharged to the canal

**BGN 36 Royal Victoria Hospital**

SEPA (0012)

It is indicated this proposal should be grouped with BGN22.

**BGN 37 – Orchard Brae Avenue**

Ian R N Stewart (0131)

It is indicated that a new school/community buildings should be provided on site.

SEPA (0012)

It is indicated that this proposal should include surface water management.

**BGN 38 Duddingston Park South**

SEPA (0012)

It is indicated that the proposal should incorporate the waterbody restoration opportunities scoping work.

**BGN 42 Balgreen Park**

SEPA (0012)

It is indicated that details of the blue green infrastructure should be set out in the description to expand on the reference to blue green in the type of proposal.

#### **BGN 44 - Leith Western Harbour Central Park Western Harbour EW1a**

Forth Ports Limited (0496)

The site area in City Plan should be updated to 4.4ha.

SEPA (0012)

It is indicated that details of the blue green infrastructure should be set out in the description to expand on the reference to blue green in the type of proposal.

#### **BGN 46 South East Wedge Parkland (Little France Park)**

SEPA (0012)

It is indicated that the proposal should incorporate the waterbody restoration opportunities scoping work.

#### **BGN 48 - West Edinburgh Blue Green Network)**

Ratho and District Community Council (0289)

No specific wording proposed however it is indicated that it should be specified that the proposals do not include any standing water or could give rise to areas of standing water.

The Davidson's Mains and Silverknowes Association (0454)

No specific wording is proposed however it is indicated that the open space at Silverknowes between Cramond and Granton is included within the West Edinburgh Green network proposal

NatureScot (0528)

The plan should be amended to make clear further work is to take place to ensure that there is wider green/blue network and active travel connectivity within Place 16 that also links to the city's wider green blue network, particularly relating to the form and function of the network.

#### **BGN 49 - Gogar Burn**

Crosswind Developments Ltd (0184)

No specific wording proposed however it is indicated that the following changes be made:

The proposal should be deleted from the Proposed Plan

If it is to be included, Proposal BGN 49 should be identified as indicative only, including on Map 2, however the representation has concerns about its inclusion on this map at all.

Further guidance is required as to whether it is 40m on each side of the burn, or 40m in total.

Edinburgh Airport Limited (0761)

It is indicated that the proposed re-alignment of the burn should be removed as a proposal and more general reference to it in the plan should also be removed, including in development principle (j) of the West Edinburgh Place Policy.

West Town Edinburgh Ltd (0660)

The proposed re-alignment of the burn should be removed as a proposal, however, it should be noted that the current route will remain an outlet for sustainable water management purposes in the event that any such diversion proceeds.

Ratho and District Community Council (0289)

No specific wording proposed however it is indicated that it should be specified that the proposals do not include any standing water or could give rise to areas of standing water.

SEPA (0012)

It is indicated that this proposal should be linked/combined with BGN 46.

**BGN 52 - Edinburgh 205**

SEPA (0012)

It is indicated that this proposal should be linked/combined with BGN 49.

**BGN 53 - Turnhouse Road**

SEPA (0012)

Potential to incorporate elements of blue-green infrastructure should be included.

**BGN 54 - Turnhouse Road (SAICA)**

SEPA (0012)

Potential to incorporate elements of blue-green infrastructure should be included.

**BGN 56 (Land adj. to Edinburgh Gateway)**

SEPA (0012)

The potential to incorporate elements of blue-green infrastructure should be included.

**BGN 57 (Seafield)**

SEPA (0012)

Potential to incorporate elements of blue-green infrastructure should be included.

## Summary of responses (including reasons) by planning authority:

### Promoted Blue Green Network proposals

#### Andy Inglis (0138)

The Council considers that there are a good number, scale and range of green blue network proposals so as to deliver the strategy and outcomes of the Plan. **No modification proposed.**

#### Archie Clark (0003)

Green Blue Network proposals should be provide multiple benefits. This means there are no proposals solely about increasing the defensibility of the Green belt, however certain proposals such as BGN 46 - South East Wedge Parkland (Little France Park) do achieve a range of benefits and these add weight to the protected status of Green belt land.

It was investigated whether there were likely to be proposals for cemetery creation or expansion coming forward the lifetime of City Plan however this was not the case so there are no such proposals in the Plan. **No modification proposed.**

#### Hillside Leisure Ltd (0080)

Although this is not proposed in the Plan it could be pursued through an application for planning permission, to be considered against relevant policies. **No modification proposed.**

#### Murrayfield Community Council (0146), Ursula Wright (0662), Louise Baker (0773), Cramond & Barnton Community Council (0243), William Brotherston (0754), Helen MacLeod (0364), Michael Ramsay (0011)

The Council is aware that there is demand for allotments across the city. Plan preparation included consultation with the Council's allotment officer, who identified certain proposals as being most suitable for delivery in the lifetime of the plan. These are shown in Table 1 of City Plan. The Council considers the Plan policies appropriate for assessing such proposals that come forward. **No modification proposed.**

#### Louise Baker (0773)

Private food growing projects are not identified in the Plan however the Council considers the policies adequate for assessing proposals that come forward. **No modification proposed.**

#### Jan Hume (0420)

The Council is not aware of specific proposals of the type referred to for this site and accordingly has not made provision for them in table 1. The Council considers the policies of the Plan, particularly Policy Env 6, support landscaping type proposals should they require planning permission. **No modification proposed.**

#### William Brotherston (0754)



The reinstatement works proposed in the representation for the Lang Linn path mainly relate to improving its overall condition (removing dumped material etc.) and thereafter ensuring adequate attention to avoiding the path deteriorating further. These types of matters are not for Local Development Plans to address as they do not constitute development in planning terms. **No modification proposed.**

#### Juniper Green and Baberton Mains Community Council (0306)

Muir Wood Field is in use as an agricultural field so is not designated in the Plan as a formal open space in the proposals map. Policy 23 'Protection of Open Space' can apply to non-designated spaces if relevant.

Upgrading of the path and conversion of the field into open space is appropriate to the Council review of its Open Space Strategy (OSS) CD066, as the main strategy document for considering the strategic provision of open space rather than through the LDP process. If such a proposal is included in the OSS then that may be appropriate to capture in the subsequent LDP. **No modification proposed.**

### **Strategic Green Blue Network**

#### NatureScot (0528)

The Council notes that the Green Blue Network (Map 6 in City Plan) is a strategic map. It is not intended to be used to identify the fine detail of opportunities for expansion and enhancement of the network. The Council will produce a refined version of the Green Blue Network map in order to inform its next Open Space Strategy as draft legislation indicates it will need to consider green networks (and proposals relating to these). **No modification proposed.**

### **Comments across multiple BGN proposals**

#### SEPA (0012)

Policy Env 6 sets requirements for green blue infrastructure. The Glossary sets out the benefits of green and blue features in the built and natural environment which provide a range of benefits which reflect the multiple functions of green blue infrastructure. It states that all new green and blue infrastructure should seek to be multifunctional and seek to provide as many of the benefits as possible. This includes the benefits for water management and biodiversity. Policy 36 (Designing for Surface Water) provides links to the Council's Surface Water Management Guidance CD077. It is not necessary to state this at each blue green network proposal. **No modification proposed.**

### **BGN 1 Inch nursery and Park**

#### Grange/Prestonfield Community Council (0192)

The Council considers that works proposed at Inch Nursery and Park should not be dependent on what changes are made at Cameron Toll. Delivery of BGN 1 has merit and deliverability in their own right. Under the Plan policies, development at Cameron Toll

would be expected to contribute in kind or financially toward BGN 1. The specifics of this are for consideration of any application which comes forward in the context of the relevant policies and guidance rather than integrating spatial allocations. **No modification proposed.**

The Woodland Trust (0774)

The Council agrees with the principle of this representation however this is a very specific matter more appropriately addressed as part of the Park Improvement Plan. **No modification proposed.**

Robyn Kane (0091)

The Blue Green Network proposal for Inch Park (BGN 1) relates to a Park Improvement Plan. It is not a housing development proposal. **No modification proposed.**

SEPA (0012)

The development of the Park Improvement Plan can incorporate the work in this area to support future fitting water management and climate adaptation. **No modification proposed.**

**BGN 2 Leith Links**

SEPA (0012)

This City Plan's policy framework, including Env 6: Green Blue Infrastructure, encourage the principle of the measures listed. To avoid duplication the Council has generally avoided specifying matters in proposals which are already addressed by policies. **No modification proposed.**

**BGN 3 Inverleith Depot**

The Friends of Inverleith Park (0459), Stockbridge and Inverleith Community Council (0741)

The Council is bringing forward a number of park improvement plans. In the case of Inch Park and Inverleith it is understood that these are both integrating the associated depot/nursery areas. In the Plan consistency has been sought to reflect this as part of overall BGN allocations for both sites that covers each element. This is the reason for BGN 3 having a different boundary to GS 8 in the Adopted LDP CD039.

Notwithstanding this, the Council notes the points made around the difference in the proposal text between GS8 and BGN3. This is again a reflection of the fact that the boundaries have changed as part of the depot being combined with the wider park for the purposes of an overall park improvement plan, however it is acknowledged that has meant less explicit comment has been made specifically about the depot in BGN 3.

It is possible for the Park Improvement Plan to take account of community views on this issue and to specify the use of the depot as greenspace.

City Plan is reflecting the delineation of open space set out in the Council's Open Space Strategy CD066, unlike Inch Nursery (which is also more centrally located within the overall park area). It is also noted this is same designation of open space that exists in the LDP 2016 CD039. It does not appear that the depot has significantly changed from these assessments of the nature of space, as it is not sufficiently vegetated or civic in nature to be considered open space. The Council will consider how the nature of and land changes over time however and this will be reviewed further at the next iteration of the Council's Open Space Strategy. **No modification proposed.**

Naomi Appleton (0271)

The matters raised are more appropriately addressed through the Park Improvement Plan for this site. This will be subject to consultation where views on these points can be shared. **No modification proposed.**

SEPA (0012)

The development of the Park Improvement Plan can incorporate the work in this area to support future fitting water management and climate adaptation. **No modification proposed.**

#### **BGN 7 - Little France**

SEPA (0012)

Primarily this proposal relates to food growing however the City Plan's policy framework, including Env 6: Green Blue Infrastructure, would be supportive of the potential to support with the proposed restoration of Burdiehouse Burn if the opportunity arises. **No modification proposed.**

#### **BGN 14 – Roseburn Street**

The following representations were received in support of this policy as proposed:

Liberton and District Community Council (0084)

#### **BGN 17 – Murrayburn Road**

Archie Clark (0003)

The proposal requires any developer of the site to undertake works to investigate the burn (for example its exact route, depth etc) to see if it is appropriate for this to be daylighted and incorporated into the development. **No modification proposed.**

SEPA (0012)

The proposal is to be read as part of City Plan as a whole, including subject policies relating to these issues. This includes policies and proposals relating to biodiversity, green blue Infrastructure such as green roofs and SUDS, Transport, improving building efficiency, encouraging renewables and reducing emissions. As such the matters raised are more appropriately dealt with through other parts of the Plan.

The proposal does note the potential to investigate the potential to daylight and incorporate this into the development. If this does occur then the policy framework of City Plan, in particular Env 6, would be supportive in principle of many of the opportunities for the relevant stretch of the burn identified in the representation. **No modification proposed.**

#### **BGN 19 Gorgie Road (east)**

SEPA (0012)

The nature of daylighting a burn is considered sufficiently self-evident as requiring an FRA so it is not stated in appendix d. The policy and legislative framework exists to allow an FRA to be required irrespective of appendix d. **No modification proposed.**

#### **BGN 20 – Crewe Road South**

Shona Morland (0769), Ian R N Stewart (0131)

This proposal involves a number of elements. The exact phasing of these relative to different stages of other development on the site has not been set out, however it will be critical that the proposal is delivered as part of the development as stated in the proposal. As such, any development should not contribute to additional water management problems thereafter. **No modification proposed.**

Ian R N Stewart (0131)

Earlier in the process of preparing City Plan, a range of work was undertaken to make a strategic assessment of land use need for the city. This included a Monitoring Statement CD023 and Housing Study CD026 as well as other work. An Education Appraisal CD015 was also undertaken to inform City Plan, with other associated Strategies such as the Council's Open Space Strategy CD066 also taken into account. The overall conclusion of this was that housing (with associated play park provision) is the most appropriate use for this site. See Issue 29 'Education' regarding Flora Stevenson school. **No modification proposed.**

The following representations were received in support of this policy as proposed:

Andrew Brown (0007), Oliver Macintyre (0019)

#### **BGN 21 – South Fort Street**

SEPA (0012)

Appendix d makes clear an FRA is required. The Development Management process shall ensure FRA should inform proposals, including their layout. This proposal does not undermine this process. **No modification proposed.**

#### **BGN 22 – Royal Victoria Hospital**

Ian R N Stewart (0131)

Earlier in the process of preparing City Plan, a range of work was undertaken to make a strategic assessment of land use need for the city. This included a Monitoring Statement CD023 and Housing Study CD026 as well as other work. An Education Appraisal CD015 was also undertaken to inform City Plan, with other associated Strategies such as the Council's Open Space Strategy CD066 also taken into account. The overall conclusion of this was that housing (with associated play park provision) is the most appropriate use for this site. See Issue 29 'Education' regarding Flora Stevenson school. **No modification proposed.**

The following representations were received in support of this policy as proposed:

Liberton and District Community Council (0084)

### **BGN 23 – Astley Ainsley Hospital**

Neil Ross (0610)

The Council will bring forward updated guidance on widths of buffer zones adjacent to bodies of water, including water courses. This will provide additional information to underpin criterion c) of Policy Env 29 (Waterside Development). The guidance will reflect SEPA guidance in making the width of such buffers proportionate to the size of watercourse in question. The figure provided in the proposal reflects what the Council estimates to be appropriate at this juncture for the size. **No modification proposed.**

Astley Ainslie Community Engagement Group (ACEG) (0275)

Policy Env 20 'Protection of Trees and Woodlands' shall apply if there were to be any risk of harm to trees on site. There is also a Tree Protection Order pertaining to this site. The effect of the policy and TPO would confer the same protection as sought in the representation. **No modification proposed.**

The following representations were received in support of this policy as proposed:

Grange/Prestonfield Community Council (0192)

### **BGN 24 - Granton Waterfront Coastal Park**

Biffa (0804)

This proposal for a coastal park (and its boundaries) reflect the development principles of Granton contained in Place Policy 4 - Edinburgh Waterfront (and associated Map 19 – Granton). In terms of the implications of Place Policy 4 and BGN 24 regarding the displacement of commercial uses then these are addressed as part of Issue 3: Delivery of the Strategy. **No modification proposed.**

The following representation supports the proposal as drafted:

Helen Mitchell (0484)

### **BGN 26 – Cramond Road North**

Lucile Cruikshand (0783), Paul Kleiser (0126),

The key objective for this proposal is to meet the strategy and aims of the plan and to address the needs of the area – including the need for useable open space. To this end the site must come forward in the lifetime of the plan. The site is large enough to provide a 2ha Large standard of open space as identified in the Council's Open Space Strategy CD066 as being needed for the area, whilst still having sufficient space to accommodate a level of development necessary to deliver of the open space. A development would not make such a space excessively noisy or deter potential users of the space. **No modification proposed.**

Richard Bright (0627)

Issues of maintenance are not matters that the Plan can address, although this proposal does agree with the point on seeking that the site should provide open space available for local use. **No modification proposed.**

AMA (New Town) Ltd (0446)

The representor notes the site is fenced off and inaccessible at present. This highlights how little benefit and function that the site is providing presently and the need for City Plan to set out a positive proposal to bring the site forward in the most beneficial way.

The Council notes that BGN 26 does not prevent sports facilities being developed on the site alongside open space. In fact, some forms of sports provision such as open pitches and playing fields can be part of the overall open space requirement provided they are publicly accessible. The provision of a Large open space in this regard would be in line with the Council's Adopted Open Space Strategy's CD066 assessment of the needs of this area which is lacking in access to such a space. **No modification proposed.**

Sportscotland (0671)

The Council considers this proposal is compatible with a proposal that combines certain forms of sports provision with open space (either useable open space in its own right or sitting alongside the space). **No modification proposed.**

The Davidson's Mains and Silverknowes Association (0454)

The proposal does not preclude tree planting and food growing and would not conflict with Plan policies. The key point is that a 2ha Large Standard accessible Open Space is still provided on site. **No modification proposed.**

**The representations below were submitted indicating supporting on the following basis:**

Mr John K Skinner (0065), Colin Crichton (0068), Diane McCutcheon (0107), Nicola Archer (0110), Paul Kleiser (0126), Sue Fernandes (0128), Joanna McColm (0139), Joanne Macleod (0177), Timothy Chares Hanson Sale (0190), Cramond & Barnton Community Council (0243), J B Michael Dick & Mrs Helen M Dick (0338), Cramond Primary School (0341), John & Maureen Pope (0347), Archie Rose (0380), Jamie

Halstead (0434), Louise Halstad (0433), Tom Davidson (0453), Alexander Dunn (0506), C Wright (0553), Brighthouse Park Owners Association (0607), Alistair Chalmers (0609), Richard Bright (0627), Elanor Cameron (0764), Gavin Cameron (0782), Andrew Shiells (0803), Michael Ramsay (0011)

Support the site being greenspace that contributes to landscape, wildlife, green and ecological networks as well as amenity, mental and physical health, the benefit of the community and local schools'/extra-curricular opportunities as well sports and recreation provision for adults, the elderly and children. This is important to satisfy shortfalls in recreational open space as identified in CEC's 'Open Space Strategy' CD066.

Paul Kleiser (0126), J B Michael Dick & Mrs Helen M Dick (0338), C Wright (0503), Alexander Dunn (0506), C Wright (0553), Alistair Chalmers (0609)

Support the site coming forward as greenspace as the land is presently a mess, and unsafe to walk on.

Colin Crichton (0068), Diane McCutcheon (0107), Nicola Archer (0110), Paul Kleiser (0126), Sue Fernandes (0128), Joanne Macleod (0177), J B Michael Dick & Mrs Helen M Dick (0338), John & Maureen Pope (0347), Archie Rose (0380), Gavin Cameron (0782), Andrew Shiells (0803)

Proposals for sports facilities and pleasant greenspace however have failed to materialize over many years. Sports facilities are not going to be viable and deliver the improvement of the site for the local community.

### **BGN 29 Craiglockhart**

SEPA (0012)

The process for how surface water run-off should be managed is addressed in policy Env 36 'Designing for Surface Water'. This policy sets out the need for water to be stored and flow above ground. In addition, it makes reference to appropriate guidance and the 'Vision for Water management for the City of Edinburgh' CD052 which sets out further detail. **No modification proposed.**

### **BGN 34 – Liberton Hospital/Ellen's Glen Road**

The following representations were received in support of this policy as proposed:

Liberton and District Community Council (0084)

### **BGN 36 Royal Victoria Hospital**

SEPA (0012)

BGN 22 relates to the same site as BGN 36 however it has been stated separately to this proposal as this proposal relates to play facilities which are more specific in nature than the more general blue green. Cross referencing between different BGN proposals is not considered necessary since both proposals can be identified on the Proposals map. **No modification proposed.**

## **BGN 37 – Orchard Brae Avenue**

Ian R N Stewart (0131)

Earlier in the process of preparing City Plan, a range of work was undertaken to make a strategic assessment of land use need for the city. This included a Monitoring Statement CD023 and Housing Study CD026 as well as other work. An Education Appraisal CD015 was also undertaken to inform City Plan, with other associated Strategies such as the Council's Open Space Strategy CD066 also taken into account. The overall conclusion of this was that housing (with associated play park provision) is the most appropriate use for this site. See Issue 29 'Education' regarding Flora Stevenson school. **No modification proposed**

SEPA (0012)

Using the SFRA CD011 as a starting point, further work was undertaken by the same consultants to review of potential strategic SUDS opportunities for new City Plan housing proposals. This helped identify the strategic SUDS opportunities noted in BGN 8-15 (inclusive). This opportunities identification did not Orchard Brae Avenue as being a strategic SUDS opportunity. **No modification proposed.**

## **BGN 38 Duddingston Park South**

SEPA (0012)

The policy framework of City Plan, in particular Env 6, would be supportive in principle of many of the opportunities for the relevant stretch of the burn identified in the representation. **No modification proposed.**

## **BGN 42 Balgreen Park**

SEPA (0012)

The 'type' of proposal for BGN 42 is stated as 'Upgrade existing play facilities to excellent standard'. There is no mention of green/blue. **No modification proposed.**

## **BGN 44 – Leith Western Harbour Central Park, Western Harbour EW1a**

Forth Ports Limited (0496)

The area of the open space approved in 19/01040/AMC is 4.4ha. It is considered unnecessary to amend BGN 44 until such a time as the park has been delivered. **No modification proposed.**

SEPA (0012)

The 'type' of proposal states that the blue and green infrastructure is to be associated with the park. It is not considered expedient to specify detail beyond this as this infrastructure should be established as part of the development of the park itself. **No modification proposed.**



## **BGN 46 South East Wedge Parkland (Little France Park)**

### SEPA (0012)

The policy framework of City Plan, in particular Env 6, would be supportive in principle of many of the opportunities for the relevant stretch of the burn identified in the representation. **No modification proposed.**

## **BGN 48 - West Edinburgh Blue Green Network**

### Ratho and District Community Council (0289)

This proposal does not specify areas of standing water. The proposal is only set out in broad terms at this stage. Site specific constraints are considered more appropriately addressed as detailed proposals are brought forward. **No modification proposed.**

### The Davidson's Mains and Silverknowes Association (0454)

This proposal itself has its boundaries drawn more closely to reflect the area expected to be delivered. As such it does not include the area of land mentioned in this representation which is further to the north east. **No modification proposed.**

### NatureScot (0528)

The Council is updating the West Edinburgh Strategic Design Framework CD065 which will inform master planning, including phasing. This will include for the green blue network as a central part of successful placemaking in the West Edinburgh area.

The green blue network is an essential part of the good connectivity across the area of Place Policy 16 and with the surrounding area. This is part of creating welcoming and pleasant routes for travel as part of 20 minute neighbourhoods. That includes linking and delivery of open space and play spaces, as well as routes between other facilities such as schools and retail centres. It will also identify and protect key existing assets that form part of this.

Consideration of West Edinburgh Green Blue Network shall be a key part of the West Edinburgh Framework which will inform a masterplan and phasing plan. The development principles for Place 16 make clear the importance of the green blue network at West Edinburgh in this regard. **No modification proposed.**

## **BGN 49 - Gogar Burn**

### Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

There are a wide range of substantial benefits to the proposal: it would improve and diversifying biodiversity and riparian habitat for aquatic and land based species; provide significant levels of climate resilience through meandering the watercourse and naturally slowing of water flows and capacity to flooding events in the buffer zone. It would provide a continuous, natural focal point providing character and identity to the West Edinburgh area that would be central in connecting multiple development sites.

The broad level of improvement that would be seen is readily apparent when the potential of the new diversion is compared to the existing man-made route. This is un-naturally straight and causes fast flowing water with very little capacity for water level rise within the narrow channel, with a large section fully culverted. As a result, there is an area of land at high fluvial flood risk adjacent to the burn. The nature of the burn and its proximity to the airport cause pollution of the water environment I

The width of buffer zone is a matter which has been considered having had regard to SEPA's Planning Background Paper: Water Environment CD129. These buffers are based on making sure the buffer width is proportionate to the watercourse to allow room for natural fluvial processes to occur, stabilising banks and reducing erosion, reducing surface pollution getting into the watercourse itself as well as providing room for meandering. This is in addition to providing space that forms a key part of an area's open space and green and blue networks.

The area for development containing the proposed burn would require a large level of open space and green network provision even without this proposal. As a result, the burn can go a long way to delivering these requirements without involving the allocation of significant tracts of further land.

A significant part of the route that runs through the airport is within the land proposed for redevelopment as part of the Crosswinds site. North of this most of the route actually follows the periphery of the airport rather than cutting across it. There is not a significant issue of needing to repurpose large areas of airport land.

The exact costs are not finalised, but it is recognised it is a significant proposal with significant cost. It is accepted that funding for the delivery is not in place, however in terms of delivery it is equally important to recognise what parties need to be involved. There would need to involve significant levels of partnership working, particularly including immediate and neighbouring landowners/land interests as well as the Council itself and many key agencies, not least SEPA, Nature Scot, Scottish Water and others. As a precursor to delivery itself however it is imperative that the land in question is safeguarded to then enable land assembly and delivery in due course. Without this safeguarding then all prospect of achieving this significant environmental enhancement will be lost as a result of development now likely to take place in the lifetime of the Plan.

The Council is content that a *minimum* of 40m is an appropriate total buffer width (not inclusive of the width of the watercourse itself). The is clear from Table 1.

This proposal has been part of the Adopted 2016 LDP CD039 as well as part of the Proposed City Plan 2030. The Council considers due consultation has taken place, although further consultation would be a key part of subsequent stages of the proposal's development and delivery.

The proposal does not make reference to standing water and the watercourse will be defined by being moving water. The Council sees significant opportunity for habitat and biodiversity enhancement in a manner that does not have to entail excessive levels of safeguarding risk. The River Almond runs immediately parallel to the northern boundary to the airport and is an even greater width of watercourse than is proposed in BGN 49. The airport has managed to co-exist with the River Almond watercourse for many years.

As such a significant proposal, the Council considers this proposal merits being included on Map 2 even when other proposals in Table 1 are not.

It is inferred that the representor is meaning that the water level of the new watercourse where it joins the River Almond would be some 5m below ground level of much of the surrounding land. In approximate terms there would appear to be ample, unused land beyond the eastern end of the runaway to allow the requisite earthworks to take place to achieve the slope needed.

#### Ratho and District Community Council (0289)

It is not considered necessary to set out what is not intended to be provided as part of proposals. **No modification proposed.**

#### West Town Edinburgh Ltd (0660), Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

The Council is aware that existing and proposed developers adjacent to the Gogar Burn channel around the airport are querying if they could discharge surface water into this channel in the event BGN 49 goes ahead. The Council has no objection to this subject to consideration of detailed proposals. The Policies of the plan make provision for this already however. **No modification proposed.**

#### SEPA (0012)

Based on what is stated in SEPA's representation regarding BGN 52 then it is assumed that it is sought to link this proposal (BGN 49) with BGN 52 (Edinburgh 205) rather than BGN 46 as the latter relates to Little France in a very different location.

BGN 49 (Gogar Burn) partly relates to the same site as the BGN 52 proposal (Edinburgh 205) for open space and play facilities. It is important to keep the proposals separate however as the facilities and Local/Large standard spaces shall need to be somewhat spread around the large area of the 205 development to ensure they are within walkable distance. **No modification proposed.**

#### **BGN 52 - Edinburgh 205**

#### SEPA (0012)

BGN 49 (Gogar Burn) partly relates to the same site as this proposal for open space and play facilities however it is important to keep the proposals separate as the facilities and Local/Large standard spaces shall need to be somewhat spread around the large area of the 205 development to ensure they are within walkable distance. **No modification proposed.**

#### **BGN 53 – Turnhouse Road**

#### SEPA (0012)

The policy framework of City Plan, in particular Env 6, would require the incorporation of blue green infrastructure as part of this proposal so it does not need to be stated in the proposal itself. **No modification proposed.**

**BGN 54 – Turnhouse Road (SAICA)**

SEPA (0012)

The policy framework of City Plan, in particular Env 6, would require the incorporation of blue green infrastructure as part of this proposal so it does not need to be stated in the proposal itself. **No modification proposed.**

**BGN 56 - Land adj. to Edinburgh Gateway**

SEPA (0012)

The policy framework of City Plan, in particular Env 6, would require the incorporation of blue green infrastructure as part of this proposal so it does not need to be stated in the proposal itself. Please see the Council's response in relation to BGN 49 in respect of the applicable points made that cross refer to that proposal. **No modification proposed.**

**BGN 57 (Seafield)**

SEPA (0012)

The policy framework of City Plan, in particular Env 6, would require the incorporation of blue green infrastructure as part of this proposal so it does not need to be stated in the proposal itself. **No modification proposed.**

**Reporter's conclusions:**

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**Reporter's recommendations:**

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Issue 19	Housing Supply Target and Land Requirement	
Development plan reference:	Part 2: Strategy - A City in which everyone lives in a home they can afford p26-28	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Archie Clarke (0003) Barratt David Wilson Homes (0677) BDW Trading (0350) BDW Trading (0678) CALA Management Ltd (0465) Dr David Houston (0655) Dr Helen Forrest (0315) Edinburgh Poverty Commission (0717) Esk Property LLP (0726) Glenmorrison Group (0600) Hallam Land Management (0599) Hallam Land Management (0615) Homes for Scotland (0404) Inverdunning (Hatton Mains) Ltd (0427) Juniper Green &amp; Baberton Mains Community Council (0306) Leith Central Community Council (0614) Mark Ockendon (0419) Mactaggart &amp; Mickel Homes Ltd (0312) Melford Developments Ltd (0308)</div> <div>Miller Homes Limited (0649) Mr T Klan (0307) Murray Estates (0197) Persimmon Homes (0495) Robertson Residential (0490) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) SEEDCo (0198) Steve Loomes (0767) Stewart Milne Homes (0118) Tarmac (0244) Taylor Wimpey (0200) Taylor Wimpey and Hallam Land Management Ltd (0603) The Association for the Protection of Rural Scotland (0334) The Stoddart Family (0749) Watkin Jones Group (0516) Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	This section of the Plan details the housing supply target and housing land requirement land requirement.	
Planning authority's summary of the representation(s):		
<div>Housing Supply Target</div> <div>Watkin Jones Group (0516) -support</div> <div>Agrees that Edinburgh needs more homes to meet housing need and support economic growth.</div> <div>Archie Clarke (0003)</div> <div>Does not believe current assumptions can be regarded as credible until after the results of Census 2022 have been published which should then determine housing need. Agree that the greatest need is for affordable housing. Note that SDP2 pitched need at over 50% and that is the level that needs to be aimed for – including a higher proportion in suitably-</div>		

priced local authority rented accommodation. Considers there are many references to affordable housing but unclear what the true affordable percentage need is for Edinburgh's entire stock, or where it should be located. Suggests that if the total need is nearly 50,000 units, then there will remain a serious shortage of affordable housing in the right places. There is no indication of where those who must live in affordable housing can be located.

Barratt David Wilson Homes (0677)

Accords with Homes for Scotland detailed submissions and recommendations to the proposed City Plan in that the basic HNDA toolkit methodology for assessing housing need and demand has serious shortcomings as a method of establishing the appropriate number of new homes to plan for. Submit Homes for Scotland Executive Summary and Housing Supply Targets and Housing Land Supply Assessment.

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

City Plan 2030 fails to engage substantively with how it can address affordability. There are significant economic and social consequences to not meeting identified need and demand in full. Neither City Plan nor the Housing Technical Note explain why, notwithstanding such consequences, a reduced figure has been chosen, nor considered its consequences. While the Plan aims to address affordability issues the housing targets it sets out and the wider spatial strategy appear more likely to contribute to the opposite outcome of reduced affordability driven by large shortages in supply.

Housing supply targets and housing and requirements are inadequate and fail to meet identified housing need and demand in full. Submit a Housing Supply Target and Land Requirement Assessment Prepared by Holder Planning. Consider that this demonstrates that the targets set out in City Plan will fall substantially short of the full housing need and demand set out in HNDA2. The Plan seeks to meet just 69% of need and demand, a shortfall of 25,577 homes in the period to 2032 which is contrary to Scottish Planning Policy. No adequate explanation of why need and demand cannot be met in full or how the impacts of not doing so could be mitigated.

There is no agreement with adjoining authorities to accommodate Edinburgh's unmet need and demand. In context of suppressed household growth, the housing supply target is inappropriate and risks further entrenching the negative consequences of inadequate housing supply.

Assume open market shared equity 2017-21 refers to actual completions which would be reasonable but seek confirmation of this. Consider the deduction of anticipated future completions on unspecified sites is not an appropriate or reasonable approach as delivery of future supply is uncertain, therefore if it does not deliver as expected, then the housing supply target becomes artificially low and the shortcoming cannot be remedied by new supply. The anticipated 960 Open Market Shared Equity dwellings 2021-2027 should be removed from the calculation of the housing supply target which would result in an affordable housing supply target of 18,312 for 2021-32. which would result in the Council's stated affordable supply of 18,304 being less than the affordable housing supply target.

The affordable housing supply target does not reflect the HNDA and there is no justification for this and therefore is not consistent with SPP 2014 paragraph 118.

The Council has failed to consider intermediate steps which may mitigate the impact of unmet housing need. In the medium to long term, increased supply helps to dampen rent increases and so an effort to boost market housing could help contribute to increased affordability in the private rented sector, providing some mitigation for the unmet affordable need.

HNDA3 has not been consulted on and does not have robust and credible status. Raise questions over the methodology for NPF4 and HNDA3. Note the Review of Housing Need and Demand (September 2020) and that it does not address the issue of circularity. Agree that as set out in the City Plan Housing Technical Note that no evidence reviewed provides a basis for moving away from the HNDA2 wealth distribution scenario.

Consider that the proposed approach is contrary to SPP 2014 paragraph 1 which seeks to deliver sustainable economic growth and is contrary to paragraph 30. Proposed City Plan does not plan to meet identified development needs and is not sustainable because it fails to meet identified housing need and demand.

Consider the most reasonable strategy to seek is to meet the HNDA2 housing need and demand in full setting a housing supply target of 62,488.

The Plan has not sought to explore what would be the best options for addressing its housing needs.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Plan places significant weight on the content set out in draft or interim planning documents that do not form part of the statutory development plan. Submit a Development Strategy Statement (ref) that examines methodology and assumptions of the Proposed Plan. Identifies significant issues in particular whether the proposed City Plan will allocate sufficient housing land to meet policy requirements of the SDP and whether it has had regard to NPF3 and SPP 2014.

Comments that the City Plan 2030 Housing Technical Note assertion that it seeks to address housing supply target is an incorrect interpretation of SPP 2014 as it is the housing land requirement that must be met.

Considers there are a number of issues in the approach to identify housing supply target and land requirement. HNDA2 does not form part of the approved development plan and should not form part of the methodology to determine housing supply targets and land requirement. Without a policy basis formed through a strategic development plan, the Plan must continue to meet the housing need and demand that arises within its authority area.

The approved SDP1 remains the extant strategic development plan and the Housing Land Technical Note (May 2014) identifies both the housing supply targets over the period 2009 to 2024 and the housing need and demand to be met from 2024 to 2032. SDP1 sets out the proposed City Plan should adopt an all tenure housing supply target of 52,015 homes

over the period from 2009 to 2032. Note that SDP1 makes no distinction between market or affordable housing.

Refer to examination report of the adopted LDP which concluded that the LDP was required to be consistent with the SDP, that it predated the SPP 2014 approach and it was not appropriate for it to redefine the targets established through SDP1 or to take a different approach and that these would be matters for the next development plan to address.

Consider approach to be contrary to SDP1 and SPP 2014.

Calculate that taking account of completions and demolitions, the remaining housing land requirement over the period 2021 to 2032 is 42,835.

Dr David Houston (0655)

Objects to the volume of housing. Consider this will lead to transport congestion and overload other existing infrastructure including schools, local NHS and social care services. Given the global warming emergency, city congestion should be avoided by developing and indeed reversing decline in other towns and villages in Scotland.

Edinburgh Poverty Commission (0717)

Do not disagree with statement regarding HNDA3 but using only the emerging data from HNDA3 and the inputs to NPF4 in respect of housing land in setting the housing supply targets is inappropriate. Neither process adequately explores and demonstrates real housing need.

Do not support statement at 2.100. If need for affordable housing is obvious then every effort must be made to publicise and demonstrate it and argue for sufficient capacity and resources.

Esk Property LLP (0726), Glenmorrison Group (0600)

SPP 2014 requires consideration of specialist housing provision as part of the Housing Needs and Demand Assessment. SPP 2014 states that where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites. There is no specific reference in the Plan to how these matters have been addressed and responded to.

Hallam Land Management (0615)

Aligned with Homes for Scotland and reserve the right to draw on their evidence as part of the LDP scrutiny and examination.

SDP 1 is out of date and provides no breakdown of housing land targets beyond 2024 meaning that there are no approved housing land targets for City Plan covering the period 2022 -32. HNDA2, HNDA3 and NPF4 are not appropriate and there is no formal mechanism for providing an alternative target. Furthermore, these appear to unduly underestimate the demand for market housing in the city thereby potentially constraining future land supply. The level of affordable provision, particularly social rented, is extremely optimistic.



No evidence that the housing supply targets consider wider economic and environmental factors.

Consider the affordable housing target based on difficulty of delivery to be perverse when the full target would be achieved by proportionately ramping up market housing supply. Suggest housing supply target of 61,467.

The Council acknowledge representations at Choices for a higher supply target without fully considering this approach and rule this out with reference to the Review of Housing Needs and Demand in Edinburgh Sept 2020. Situation is confusing and poorly aligned in terms of the LDP process which presented its own numbers through the Choices Report.

Do not agree with HNDA2. Have examined the Councils projections and make alternative suggestions within supporting note- Hallam Land Management Ltd Response to Housing Technical Note. Identifies higher level of market housing resulting in need and demand of 75,948. Consider this reflects evidence from HNDA and performance in terms across all tenures and a more realistic share of needs without bias to the affordable sector reflecting the level of likely public funding, delivery constraints, viability and reality that private development sites will need to drive affordable delivery in line with release of land for a minimum 35% provision.

#### Homes for Scotland (0404)

Submit an Executive Summary -City of Edinburgh Council Proposed 'City Plan' Consultation. Consider that the basic HNDA toolkit methodology has serious shortcomings and consider it would be appropriate to take these into account in establishing the Housing Supply Target. Refer to submitted document Abridged version of HFS April 2021 briefings on NPF4 MATHLRs.

The Council has only planned for 69% of the need and demand identified in HNDA2 and has not provided a good explanation as to why this is appropriate and how the consequences will be dealt with. Whether planning from the evidence base originally established through HNDA1, or the more recent HNDA2 update, note the Council's housing supply target is not aligned with either iteration, despite the Council appearing to want to meet its own need and demand rather than continuing to rely on housing development elsewhere in the city region. The Council has not given a clear set of reasons for its decision to under-plan. Provide an Executive Summary setting out concern that proposed City Plan should be founded on a strong understanding of need and demand and believe that instead the Plan is founded on not releasing any further greenfield land for housing irrespective of implications.

Makes reference to submitted report The Economic and Social Benefits of Home Building in Scotland 2016, which highlights issues in the gap between housing need and supply. Considers that limiting development opportunities risks limiting the capacity for post-pandemic recovery and exacerbating existing economic and social problems.

Raise concerns around HNDA3 methodology.

#### Inverdunning (Hatton Mains) Ltd (0427)

Submit a supporting document Representation to Proposed (Edinburgh) City Plan 2030 Supporting Document & Appendices. Consider that the Plan meets less than half of the net HNDA2 affordable demand between 2021-32. There is scope for increased supply through affordable housing policy (at 35%) on additional mixed-tenure sites which requires an increased overall housing and requirement. Affordable delivery can be via private housebuilders through range of unsubsidised tenures so it not reliant on capacity of Council or registered social landlord build programmes or grant funding. The completion of around 16,000 affordable homes between 2017-27 fall short of the 20,000 Council commitment figure for this period. The Plan should reflect that the affordable housing target is in excess of the council commitment.

Proposes two options to address the discrepancy between affordable housing need and target. Firstly, an adjustment based on increasing affordable housing target as set out which would require an increased market housing target to deliver affordable on a pro-rata basis. This option results in a large residual shortfall in target versus proposed supply. The second option would be to utilise the Council's proposed NPF4 minimum housing land requirement as this accords with latest projection for a set 10 year period. Considers that both options result in a significant shortfall in housing allocations based upon an assessment of deliverability of proposed plan allocations and additional sites with the option of new settlements should be included.

#### Juniper Green & Baberton Mains Community Council (0306)

Strongly agree that the greatest need is for affordable housing. Note with concern that plan states on page 28 "It is not realistic to set a housing supply target which provides in full for the need for affordable housing". Developers have found ways to pay unrealistically low commuted sums to avoid providing this accommodation and must be legally obliged to pay the full sum and provide the accommodation. Not in a position to judge the accuracy of the housing supply target calculation, but strongly request is reviewed as soon as 2022 Census results become available.

#### Leith Central Community Council (0614)

Ask "what is the Housing Supply target for Leith?"

#### Mactaggart & Mickel Homes Ltd (0312)

HNDA2 is dated 2016 or thereabouts and it is considered that a new HNDA should have been provided to support and inform the Proposed City Plan 2030. Whilst a HNDA3 is being prepared, it is understood that this has not been finalised to date. The Plan is considered non-compliant with SPP 2014, which states at paragraph 119 "Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the Plan period to meet the housing land requirement".

#### Mark Ockendon (0419)

Objects to the housing supply target as considers no growth is required and states that in relation to the higher minimum figure considered appropriate by the Council that a specific consultation with local residents should be conducted rather than councillor's views. Considers it nonsense that the public sector cannot deliver the affordable housing requirements itself and the Council should have more ambition.

Melford Developments Ltd (0308)

Not convinced that the HNDA and associated assessments are competent as different figures appear to be unreliable and therefore not credible. The Plan figures do not represent full need and demand requirements.

Mr T Klan (0307)

Amend Aim 6 to: 'Developing land to fully meet Edinburgh's housing needs over the next decade and securing a minimum of 35% affordable housing contribution from new developments across the city.'

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Note and welcome reference to the work undertaken to establish a Minimum All-Tenure Housing Land Requirement for draft NPF4. Note that the proposed plan was published prior to draft NPF4 being published, therefore, paragraphs 2.104 and 2.105 do not reflect the up to date position as contained within draft NPF4. Page 28 Paragraphs 2.104 and 2.105 should reflect that the Initial Default Estimates provided to local authorities were a starting point for local consideration and to enable local input and were in general, a statistical and policy neutral figure to build upon. The estimates were expected to see increase through local input that took into account public and private sector ambitions to support growth in housing provision. The Initial Default Estimates were not necessarily the estimates that were expected to be included within draft NPF4.

Paragraph 133 of SPP 2014 states local development plans should identify suitable sites for Gypsy/Travellers and Travelling Showpeople if there is a need. It is unclear from the Plan and associated background documents whether this need has been considered and if a need was identified. Draft NPF4 also states that diverse needs and delivery models should be taken into account across all areas, as well as allocating land to ensure the provision of accommodation for Gypsy/Travellers and Travelling Showpeople.

To meet the requirements of paragraph 132 of SPP 2014 which states 'as part of the HNDA, local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing the Plan should clarify what specialist housing need, if any, was identified as part of the HNDA and what the Plan intends to do to support the delivery of other specialist housing, if a need was identified. Due regard should also be given to the requirement, published in Local Housing Strategy guidance, to set targets for wheelchair accessible housing across all tenures. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites'.

Draft NPF4 also states that an equalities led approach to addressing identified gaps in provision should be taken and it is unclear from the proposed plan and associated background documents whether this need has been considered and if a need was identified.

Tarmac (0244)

Aligned with Homes for Scotland and reserve the right to draw on their evidence as part of the LDP scrutiny and examination. Submit a supporting document Tarmac Response to Housing Technical Note, Rick Finc Associates.

SDP1 is out of date and provides no breakdown of housing land targets beyond 2024 meaning that there are no approved housing land targets for City Plan covering the period 2022 -32. HNDA2, HNDA3 and NPF4 are not appropriate and there is no formal mechanism for providing an alternative target. Furthermore, these appear to unduly underestimate the demand for market housing in the city thereby potentially constraining future land supply. The level of affordable provision, particularly social rented, is extremely optimistic.

No evidence that the housing supply targets consider wider economic and environmental factors. Consider the affordable housing target based on difficulty of delivery to be perverse when the full target would be achieved by proportionately ramping up market housing supply.

The Council acknowledge representations at Choices for a higher supply target without fully considering this approach and rule this out with reference to the Review of Housing Need and Demand in Edinburgh, 2020. Situation is confusing and poorly aligned in terms of the LDP process which presented its own numbers through the Choices Report.

#### Taylor Wimpey and Hallam Land Management Ltd (0603)

Refers to Taylor Wimpey's submission, Housing Supply Target and Housing Land Requirement Assessment, Holder Planning, December 2021 in respect to the housing land requirement which demonstrates that the targets set out in City Plan 2030 fall substantially short of reflecting the City's full housing need and demand set out in HNDA2 as it seeks to meet just 69% of need and demand, a shortfall of 25,577 homes in the period to 2032.

#### The Stoddart Family (0749)

Consider that a new HNDA should have been provided to support and inform the proposed City Plan 2030. Support the position of Homes for Scotland in terms of their objections raised to the proposed plan.

#### Wright PDL (0078) Steve Loomes (0767)

City Plan is informed by numbers that do not fully take account of the real need and demand. Consider there are shortcomings of the default HNDA methodology that would be appropriate to consider in setting the housing supply target. Refer to Homes for Scotland paper distributed to local authorities and the Scottish Government in Spring 2021, in relation to the emerging housing numbers for NPF4.

Whether planning from the evidence base originally established through HNDA1, or the more recent HNDA2 update, notes the Council's housing supply target is not aligned with either iteration despite the Council appearing to want to meet its own need and demand rather than continuing to rely on housing development elsewhere in the city region. Plan only provides for 69% of need and demand identified in HNDA2 with no clear reasons.

Raise concerns regarding HNDA3. The review of the most recent HNDA suggests household formation may be lower in the future than previously predicted. This proposition is based in incomplete evidence and fails to grapple with the full range of need and demand for homes in the city. If City Plan doesn't plan to meet all the demand that exists, there is a significant risk that prices will continue to increase as a consequence.

## **Housing Land Requirement**

Archie Clarke (0003)

20% generosity is a ridiculously high figure, would lead to land blight and should be reduced to 5% and only when the accommodation built and in occupation reaches 3% should the figure be revisited. The 25% 'flexibility allowance' mentioned in paragraph 2.104 appears to further increase this inflated figure.

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Persimmon Homes (0495, Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Refer to Housing Supply Target and Housing Land Requirement Assessment, Holder Planning, December 2021. Note that the Plan is being prepared in an unstable policy and legislative context. Note that SDP1 and the Housing Land Supplementary Guidance documents were prepared before SPP 2014 and so do not include housing land requirements with a generosity included. Note that they do set out housing requirements which have been considered equivalent to housing supply targets at subsequent LDP examinations. Note that beyond 2024 a "likely" housing requirement is identified for the SESplan region as a whole for the 2024-32 period of 47,999 houses, but not expressed as a number that requires to be achieved, is not broken down by Council area and it is based on HNDA1, which has been superseded. Consequently, the Plan has no prescribed housing land requirement which it is to be consistent with. Question in this context if the Plan can set a housing land requirement and be consistent with the approved SDP.

The City Plan 2030 and Housing Technical Note refer to NPF4 minimum housing land requirements and preliminary results from HNDA3. The Council proposed a minimum 10-year housing land requirement of 48,125 which is notably higher on an annualised basis than the proposed City Plan housing land requirement of 44,293 (4,027dpa) over 11 years.

High generosity margin is not a substitute for a demonstrably deliverable housing land supply which the Plan fails to provide. Consider the most reasonable strategy to seek to meet the HNDA2 housing need and demand in full setting a housing supply target of 62,488. Suggest this would require a rethink of the spatial strategy and that it may be appropriate to review the generosity margin.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Refers to submitted Development Strategy Statement. HNDA2 should not form part of the methodology for determining the requirement. Note that the Council has adopted a

generosity allowance of 20% and taking this into account the Plan should identify a housing land requirement of 62,418 homes to be delivered over the period to 2032.

In accord with SPP 2014 the Council must first establish its housing land requirement before seeking to address the manner in which it will be met. Housing completions are required to be subtracted from the housing land requirement not the estimates of housing need and demand or housing supply target as proposed in the City Plan Housing Technical Note.

Refer to SESplan Housing Land Technical Note (May 2014) which establishes that completions; demolitions; effective land supply; constrained sites; and windfall should contribute to establishing whether the housing land requirement should be met. Taking account of completions and demolitions identify a remaining housing land requirement over the period 2021 to 2032 of 42,835.

Dr Helen Forrest (0315)

Extremely concerned about the continuing housing development in Edinburgh. Many of the new builds are bought for letting purposes and very little social housing is available. At a time when there is known to be no likelihood of native growth in population and hasn't been for many years, all population growth will be from outwith Scotland.

Hallam Land Management (0615) Tarmac (0244)

No explanation for generosity allowance of 20%. Given population projections, household formation and the strength of the market, could be higher at 25%.

The housing land requirement within the Plan is flawed in that it underplays the need and demand in the city and overestimates the quantum of land which can come forward over the Plan period, it will not meet demand in full or maintain a generous supply of land for housebuilding.

Inverdunning (Hatton Mains) Ltd (0427)

Housing land requirement and housing land supply should be amended based on deliverability assessment of City Plan sites. Propose two options set out in Representation to Proposed (Edinburgh) City Plan 2030 Supporting Document & Appendices. Firstly, meeting a higher proportion of the affordable housing demand, and secondly utilising the Council's proposed minimum all-tenure housing land requirement proposed to the Scottish Government as part of NPF4. Both options result in a significant shortfall in housing allocations based upon an assessment of deliverability. Require additional site to be brought forward and the spatial strategy option of new settlements should be included, in line with existing SPP.

Reference at 2.16 of plan to draft NPF4 minimum housing land requirement figures is not matched by reference to housing land requirements in associated housing section and there is a discrepancy between reference to draft NPF4 figures and the figures utilised in tables on pages 28-29 of the plan.

Juniper Green & Baberton Mains Community Council (0306)

Consider that flexibility allowance of 25% for calculating housing land needed appears excessive and should be reduced to perhaps 5% and then revisited only when the approved housing has been built and fully occupied. The relationship to section 2.104 of the table on page 29, showing a flexibility allowance of 56%, is not clear and are unsure of the purpose of the table.

The Association for the Protection of Rural Scotland (0334)

Support the allocation of land, well above the amount required by the housing supply targets and the minimum all tenure housing land requirement in draft NPF4. Express disappointment that circumstances require the allocation of larger amounts of land for market housing in order to achieve a target amount of affordable housing which seems at odds with policies to use land and resources more efficiently.

**Modifications sought by those submitting representations:**

**Housing Supply Target**

Archie Clarke (0003)

No modification specified.

Barratt David Wilson Homes (0677)

Aligned with Homes for Scotland response.

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Amend Table on p. 28 City Plan Housing Land Requirement 2021-2032 to meet HNDA2 housing need and demand in full equating to a Housing Supply Target of 62,488.

Remove anticipated 960 open market shared equity dwellings 2021-2027 from the calculation of the housing supply target.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

No modification specified.

Dr David Houston (0655)

No modification specified however infers there should be no growth.

Edinburgh Poverty Commission (0717)

Implies plan should aim to meet full need for affordable housing.

Esk Property LLP (0726)

Identify need for specialist housing provision.

Consider allocation of specific sites.

Glenmorrison Group (0600)

Amend paragraph 2.2 criterion 6 (page 8) to:  
Delivering land to meet Edinburgh's housing needs over the next decade... including sufficient land to make provision for the specific needs of elderly people

Hallam Land Management (0615)

Aligned with Homes for Scotland response.

Suggest Alternative HNDA scenario.

Positive Scenario	2012-2032	Completions 2012-21	Need / Demand 2021-32
Social Rent	36,969		
Sub- Market Rent	12,944		
Total Affordable	49,913	6,984	42,929
Private Rent	15,762		
Owner Occupied	29,470		
Total Market	45,232	12,213	33,019
Total Housing	95,145	19,197	75,948

Suggest total all tenure Housing Land Supply Target of 58,000 with 28,500 being affordable.

Amend Housing Supply Targets as follows:

City Plan Housing Supply Targets	2021-32
Market Demand 2012-32	45,232
Completions 2012-21	12,213
Market Target 2021-32	33,019
Affordable Target 2017-27	20,000
Affordable Target 2027-32	2,500
New Build Completions 2017-21	3,306
Open Market / Shared Equity 2017-21	882
Open Market / Shared Equity 2021/32	
New Build Affordable Target 2021-32	28,448
Total Housing Supply Target 2021- 32	61,467

Revise paragraph 2.16 on minimum housing land to reflect amended housing land supply and requirement.



#### Homes for Scotland (0404)

No specific change suggested but consider it would be appropriate to take into account shortcomings of HNDA methodology in calculating housing supply target.

#### Inverdunning (Hatton Mains) Ltd (0427)

Amend line 2 of Introduction 1.4: "City Plan 2030 will allow for affordable homes targets to be increased to address the significant level of assessed demand, which will include a higher contribution via new mixed tenure housing land allocations."

Amend line 2 of para 2.101 "The affordable housing supply target set out will exceed the 2017 Council commitment and ensure identified demand is more fully addressed."

Amend para 3.22 to reflect affordable housing target to be in excess of current Council commitment.

Amend Housing supply target to:

Option 1:

Market demand 2012-2032 (HNDA2-upper)	41,166
Completions 2012-2021	12,213
Market Target 2021-2032	28,953
Affordable Demand 2012-2032 (HNDA2 – mid)	49,913
Completions 2012-2021	6,984
Affordable Net Demand 2021-2032	42,929
SHIP Forecast 2021-2027	11,342
Rolled forward SHIP Forecast 2027-2032	9,451
Additional AHP Contribution	4,322
Affordable Target 2021-2032 (58% demand)	25,115
Total Housing Supply Target 2021-2032	54,068

Option 2:

Total All-Tenure Housing Supply Target 2022-2032	38,500
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#### Juniper Green & Baberton Mains Community Council (0306)

Review housing supply target following Census 2022 results.

Leith Central Community Council (0614)

No modification specified.

Mactaggart & Mickel Homes Ltd (0312)

No modification specified.

Mark Ockendon (0419)

At 2.89 remove: "Edinburgh needs more homes to meet housing need and support economic growth."

Revise 2.102: to "Demand remains strong in Edinburgh, and local residents will be consulted specifically on their appetite for increased housing in their city."

Melford Developments Ltd (0308)

No modification specified.

Mr T Klan (0307)

Amend Aim 6 to: 'Developing land to fully meet Edinburgh's housing needs over the next decade and securing a minimum of 35% affordable housing contribution from new developments across the city.'

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

At Page 28 Paragraphs 2.104 and 2.105 reflect that the Initial Default Estimates provided to local authorities were a starting point for local consideration and to enable local input.

Confirm whether there is a need for sites to be allocated for Gypsy/Travellers and Travelling Showpeople.

Clarify what specialist housing need, if any, was identified as part of the HNDA and what the Plan intends to do to support the delivery of other specialist housing, if a need was identified.

Give due regard to the requirement, published in Local Housing Strategy guidance, to set targets for wheelchair accessible housing across all tenures.

Tarmac (0244)

Aligned with Homes for Scotland response.

Increase housing supply target and land requirement.

Taylor Wimpey and Hallam Land Management Ltd (0603)

No modification specified.

The Stoddart Family (0749)

A new HNDA should have been provided to support and inform the plan.

Support the position of Homes for Scotland in terms of their objections raised to the proposed plan.

Wright PDL (0078), Stephen Loomes (0767)

Implies that full need and demand should be met.

**Housing Land Requirement**

Archie Clarke (0003)

Reduce 20% generosity figure to 5% and only when the accommodation built and in occupation reaches 3% should the figure be revisited.

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Robertson Residential (0490), Persimmon Homes (0495), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Review generosity margin.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Amend housing land requirement as follows:

	2021-2032	
Housing land Requirement	62,418	
Housing Completions	23,651	<i>minus</i>
Demolitions	4,068	<i>plus</i>
Remaining HLR	42,835	<i>equals</i>

Dr Helen Forrest (0315)

No modification specified.

Hallam Land Management (0615) Tarmac (0244)

Implies increasing generosity allowance to 25%

Inverdunning (Hatton Mains) Ltd (0427)

Implies removal of reference to NPF4 figures.

Amend housing land requirement for option 1 to 67,585.

	Total	Market	Affordable
Total Housing Supply Target 2021-2032	54,068	28,953	25,115
Generosity Allowance 25%	13,517		
Housing Land Requirement	67,585		

Amend housing land requirement for option 2 to 48,125.

	Total	Market	Affordable
Total Housing Supply Target 2021-2032	38,500	Tbc	Tbc
Generosity Allowance 25%	9,625		
Housing Land Requirement	48,125		

Amend para 2.103

“The rate at which housing sites are developed is constrained by a variety of factors including market conditions. In order to ensure that a generous supply of land for housing is provided, SPP states that the Housing Supply Target should be increased by a margin of 10 to 20%, depending on local circumstances to establish the housing land requirement. However, the Proposed National Planning Framework 4 proposes 25% generosity allowances for urban areas including Edinburgh and this is reflected in the Proposed City Plan 2030.”

Juniper Green & Baberton Mains Community Council (0306)

Reduce generosity allowance of 25% to 5% and revisit only when the approved housing has been built and fully occupied.

The Association for the Protection of Rural Scotland (0334)

No modification specified.

## Summary of responses (including reasons) by planning authority:

### Housing Supply Targets

Barratt David Wilson Homes (0677), BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Edinburgh Poverty Commission (0717), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Mactaggart & Mickel Homes Ltd (0312), Melford Developments Ltd (0308), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Taylor Wimpey (0200), Tarmac (0244), Taylor Wimpey and Hallam Land Management Ltd (0603), The Stoddart Family (0749), Wright PDL (0078)

The housing supply target is a policy view of the number of homes to be delivered in Edinburgh over the period of the Plan. The housing supply targets have been set using a methodology compliant with SPP 2014 and related guidance. The methodology is set out Section 3 of the City Plan Housing Technical Note (CD018) and additionally the first part of the Housing Study (CD026) produced for the MIR.

SPP 2014 (CD096) requires that the LDP sets the housing supply target, split between affordable and market housing based on evidence from the Housing Need and Demand Assessment (HNDA). The target should be reasonable, should properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence. In Edinburgh the housing supply target would normally be set by the SDP. The approved SDP1 2013 (CD087) provides an all-tenure housing supply target to 2024. Following rejection of SDP2 (CD088) which would have covered the period of City Plan 2030 there is no housing supply target at local authority level to cover the entire period of City Plan.

At the time of the proposed plan's preparation the most up to date assessment of future housing need and demand for City of Edinburgh over the City Plan period was the Housing Need and Demand Assessment (HNDA2) (CD094) carried out to inform the Proposed SDP2 2016. HNDA2 was prepared in line with Scottish Government's HNDA Guidance and determined to be robust and credible by the Scottish Government. While the Proposed SDP2 2016 (CD088) was rejected by Scottish Ministers, the Report of Examination of SDP2 (CD155) and subsequent rejection by Scottish Ministers did not question the validity of HNDA2. HNDA2 forms the basis to determine how much of the remaining regional housing supply target from SDP1 (CD087) should be met within Edinburgh.

HNDA2 set out three scenarios Steady Recovery, Wealth Distribution and Strong Economic Growth. In 2013 a study, Edinburgh City Region Economic Review, Economic Futures 2011 (CD092), was carried out to assist SESplan in selecting the most appropriate scenario upon which to base its housing supply targets. The study concluded that either of the two lower forecasts of need/demand (steady recovery or wealth distribution) may be suitable but that the higher scenario (strong economic growth) was unrealistic. The wealth distribution scenario has been used to form the basis of the City Plan housing supply target.

HNDA2 (CD094) gives estimates of affordable housing need and demand for market housing. Demand for market housing includes the demand for owner occupied homes and the demand for private rented homes. Affordable housing need is defined as the need for homes that cannot be met through the open market – that is social rented homes and homes for rent below market rates.

### Housing Demand

The housing supply target set out in section 3 of the City Plan Housing Technical Note, September 2021 (CD018), and page 28 of the proposed plan seeks to meet the demand for market housing over the Plan period in full. Demand for market homes is the total demand for owner occupied homes and private rented homes. Over the period 2012 to 2032, the HNDA2 (CD094) estimate of demand for market homes was 31,772. Over the period 2012 to 2021, there have been 12,213 market homes completed (sourced through the annual housing land audit and completions programme). Deducting this figure from the total estimate of demand for 2012 to 2032 yields an estimate of demand for the period 2021 to 2032 of 19,559 homes. This estimate of total demand for market housing forms the Housing Supply Target for market homes set out in Table 2 of the City Plan Housing Technical Note, September 2021 (CD018) and the table on page 28 of the Plan.

### Affordable Housing Need

HNDA2 (CD094) estimated the need for affordable housing for the period 2012 to 2032 to be 49,913 homes. This includes need for social rented homes and homes for rent below market rate. Deducting affordable completions for the period 2012 to 2021 results in an estimate of housing need for the period 2021 to 2032 of 42,929 affordable homes.

In setting housing supply targets, SPP 2014 (CD096) requires planning authorities to take into account “wider economic, social and environmental factors, issues of capacity, resource and deliverability”. Delivery of affordable housing is largely determined by availability of funding and is also dependent to a significant extent upon private sector housing delivery and the affordable housing policy of the development plan. The Council Business Plan 2017-2022 (CD085) set out a commitment to develop a programme to deliver at least 10,000 social and affordable homes over the following five years, with a plan to build 20,000 by 2027.

It would not be realistic to set a target which provides in full for the need for affordable housing identified in HNDA2. It would not be possible to deliver that amount of affordable housing within the period of the Plan with regard to the issues of capacity and resources. Delivery of affordable housing is largely determined by availability of funding. The Council’s Strategic Housing Investment Plan (SHIP) 2022-2027 (CD057) sets out the delivery plan for new affordable homes. Around half of the sites included in the SHIP are in the control of private sector landowners and developers. Delivery of affordable housing is, therefore, also dependent to a significant extent upon private sector housing delivery and the affordable housing policy of the development plan. Over 50% of the current land supply (legacy sites and other sites in the current land supply) are already committed to provide affordable housing under the adopted Edinburgh Local Development Plan (CD039) affordable housing policy requirement of 25%.

Table 2 of the City Plan Housing Technical Note, September 2021 (CD018) sets out the housing supply targets taking account of actual completions for market housing and

affordable housing, including Open Market Shared Equity. Open Market Shared Equity are existing homes currently in the market sector that are purchased under shared equity arrangements. These contribute toward meeting the Council commitment to affordable housing and are included in the calculation to determine the target for new build affordable housing.

The affordable housing supply target has been set at 17,350 for the period 2021 - 2032. This will meet the Council Commitment in full and acknowledges that affordable housing will continue to be delivered beyond 2027. It takes account of the constraints on delivery of affordable housing and the reliance on market housing to provide affordable housing.

## **Conclusion**

There is no justification for a higher supply target than set out in HNDA2 (CD094). A Review of Housing Need and Demand in Edinburgh (CD019) was carried out in September 2020 by consultants Indigo House. The study included a review of the HNDA2 figures based on the most recent Household Projections since HNDA2, interpretation of HNDA2 in Choices for City Plan 2030 (CD022), along with other available evidence on need and demand. The study also examined the likely impact of the current crisis/recession on demand for affordable housing. As set out above the HNDA2 provided a range of estimates of housing need and demand based on different assumptions about the local economy and possible household growth. The study found the medium and low scenarios to be the most likely. The study concluded that the City Plan housing supply target set out in Choices was reasonable when considered against the reviewed HNDA2 estimates of need and demand.

The local authorities within South East Scotland area have jointly prepared Housing Need and Demand Assessment 3 (HNDA3) (CD095) for South East Scotland. It was determined to be robust and credible by the Scottish Government on 28 July 2022. HNDA3 estimates for need and demand for new housing continue to show a strong need for affordable housing compared to market housing. The estimate of demand for market housing is lower than that estimated in HNDA2. The all tenure housing supply target in the Plan is higher than the HNDA3 all tenure figure. This suggests that the housing supply target is more than enough to meet need and demand.

Further detail on the methodology for setting the housing supply target for affordable homes is set out in paragraphs 3.13 to 3.22 of the City Plan Housing Technical Note, September 2021 (CD018). A Review of Housing Need and Demand in Edinburgh (CD019) concluded that the housing supply targets set out in Choices were reasonable when considered against the reviewed HNDA2 estimates of need and demand. The housing supply targets comply with the requirements of SPP 2014 (CD096) and are considered deliverable over the Plan period. **No modification proposed.**

Archie Clarke (0003), Juniper Green & Baberton Mains Community Council (0306)

Population projections form part of the HNDA methodology. HNDA2 (CD094) forms the basis of the housing supply target and has signed off as been robust and credible by the Scottish Government. It is necessary to utilise projections to allow forward planning and it not considered appropriate to withhold the Plan process until such time as Census 2022 results are published. **No modification proposed.**

Dr David Houston (0655)

Edinburgh's population is forecast to grow. The Plan is required to meet the housing needs to support this growth. Policies are set out to protect residential amenity and to ensure that any community infrastructure required as a result of development is provided. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

It is not necessary to amend line 2 of para 2.101 or para 3.22. As set out above it is not realistic to set a housing supply target which provides in full for the need for affordable housing identified in the HNDA2 (CD094) as it would not be possible to deliver the amount of affordable housing within the period of the Plan with regard to the issues of capacity and resources. **No modification proposed.**

It is not necessary to amend line 2 of Introduction 1.4. As set out above the affordable target has been set at a level that is considered to be deliverable. Allocating more land for mixed tenure housing to address the affordable demand would not be likely to increase the likelihood of more affordable housing provision due to limitations on funding and the capacity of market developers to open up sites and allow for additional affordable supply. **No modification proposed.**

Leith Central Community Council (0614)

SPP 2014 (CD096) requires only that housing supply targets are set at local authority level. **No modification proposed.**

Mark Ockendon (0419)

SPP 2014 (CD096) requires that the LDP sets the housing supply target, split between affordable and market housing based on evidence from the HNDA. HNDA2 (CD094) identifies a need for housing based upon a growing population. **No modification proposed.**

Mr T Klan (0307)

It would not be realistic to set a target which provides in full for the need for affordable housing identified in HNDA2 (CD094) as it would not be possible to deliver that amount of affordable housing within the period of the Plan with regard to the issues of capacity and resources. **No modification proposed.**

**Specialist Housing Need**

Esk Property LLP (0726), Glenmorrison Group (0600), Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

SPP 2014 (CD096) requires consideration of specialist housing provision as part of the Housing Need and Demand Assessment. It states that where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites. HNDA2 (CD094) has been assessed as robust and credible by the Scottish Government. It does not provide a separate assessment of need



for specialist housing. This is included within the overall assessment of need and demand.

There is limited availability of robust data on the extent and nature of provision and amount and unmet housing need for specialist housing and housing for older people. There is therefore no basis on which to quantify need.

Instead, delivery of specialist housing and housing for older people is supported in City Plan policies. Policy Hou 3 Mixed Communities requires that the mix of housing provided should respond to the differing needs of residents, including older people and those with special needs. The Council's Edinburgh Design Guidance (CD047) supports Scottish Government's Housing for Varying Needs Standards which sets good practice on design of housing to achieve flexibility and suitability for people of all abilities and is the standard which applies to all RSL development. Policy Hou 3 is dealt with under Issue 24: Mixed Communities and specific policy for specialist needs is dealt with under Issue 26: Housing Policies. **No modification proposed.**

Paragraph 133 of SPP 2014 states local development plans should identify suitable sites for Gypsy/Travellers and Travelling Showpeople if there is a need. In producing HNDA2 (CD094) the SESplan Core Housing Market Partnership considered that there was a lack of up to date information and data relating to Gypsy/Travellers and their accommodation needs nationally making it difficult to assess housing need. In the absence of any demonstration of need the City Plan Policy Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople provides flexibility to deal with any evidence which may emerge during the lifetime of the plan. **No modification proposed.**

### **HNDA3**

Barratt David Wilson Homes (0677), BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Edinburgh Poverty Commission (0717), Hallam Land Management (0599), Hallam Land Management (0615) Homes for Scotland (0404), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Tarmac (0244), Taylor Wimpey (0200), Wright PDL (0078) The Stoddart Family (0749)

The local authorities within South- East Scotland area have jointly prepared Housing Need and Demand Assessment 3 (HNDA3) (CD095) for South East Scotland. Estimates of future need and demand for new housing under the default scenario are set out in the City Plan 2030, Housing Technical Note, September 2021 (CD018). These have been provided for information and do not form part of the methodology for calculating the housing supply target for City Plan 2030. The methodology for HNDA3 is set by Scottish Government. HNDA3 was determined robust and credible by the Scottish Government in July 2022. **No Modification proposed.**

### **NPF4 Housing Land Figures**

Archie Clarke (0003), BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Edinburgh Poverty Commission (0717), Hallam Land Management (0615) Hallam Land Management (0599), Inverdunning (Hatton Mains) Ltd (0427), Juniper Green & Baberton Mains Community Council (0306), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198),

Stewart Milne Homes (0118), Taylor Wimpey (0200), Scottish Government - Planning and Architecture Division - Development Plans Team (0309), Tarmac (0244)

The City Plan 2030 Housing Technical Note, September 2021 (CD018) sets out the proposed methodology, issued by Scottish Government, to calculate the amount of housing land that should be allocated as a default minimum requirement in Local Development Plans. This has been provided for information and does not form part of the methodology for calculating the housing supply target for City Plan. There is no discrepancy between the figures set out on page 28 and 29 of the proposed City Plan which set out the housing land requirement and housing land supply and paragraph 2.16. Paragraph 2.16 is a reference to the publication of NPF4 housing land figures and does not suggest that these form any part of the methodology for calculating the housing land requirement for City Plan. The methodology is set by Scottish Government. **No modification proposed.**

### **Housing Land Requirement**

BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Hallam Land Management (0615), Hallam Land Management (0599), Inverdunning (Hatton Mains) Ltd (0427), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Tarmac (0244), Taylor Wimpey (0200), The Association for the Protection of Rural Scotland (0334)

The housing supply target is a policy view of the number of new homes to be delivered over the Plan period. The housing land requirement is the amount of land required to ensure that the target can be met. SPP 2014 (CD096) states that in order to ensure that a generous supply of land for housing is provided the housing supply target should be increased by a margin of 10 to 20% to establish the housing land requirement. It allows for the extent of the margin to be set dependent on local circumstances. The housing supply target and housing land requirement are set out on page 28 of the proposed plan. The methodology for setting the housing supply target is detailed in Section 3 of the City Plan 2030 Housing Technical Note, September 2021 (CD018). Section 4 shows how the housing supply target is used to set the housing land requirement.

The City Plan housing land requirement adds 20% to the housing supply target to ensure that there is sufficient housing land for the target to be met. This is the upper end of the range set by SPP 2014 (CD096) paragraph 116 and reflects the spatial strategy of the plan. The sources of land to meet the housing land requirement are detailed in the table on page 29 of the proposed plan. This identifies land supply 50% higher than the housing supply target. Land supply is dealt with under Issue 20: Assessment of Housing Land Supply.

It is accepted that the draft NPF4, November 2021 (CD099) provides a higher generosity figure of 25%. However, NPF4 has not yet been finalised and as such the figure is consistent with current policy. The City Plan housing land requirement is similar to the Minimum All-Tenure Housing Land Requirement set out in draft NPF4. Additionally, as noted above, the Plan provides additional generosity though the land supply which is in excess of 50%. 20% generosity is considered to be appropriate and there is no need to review the generosity margin. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clarke (0003)

The housing land requirement adds 20% to the housing supply target to ensure that there is sufficient housing land for the target to be met. This is the upper end of the range set by SPP 2014 (CD096). Reference to 25% flexibility allowance at paragraph 2.104 relates to the methodology for calculating the amount of housing land that should be allocated in NPF4 (CD099) as a default minimum requirement. This has been provided for information and does not form part of the methodology for calculating the housing supply target for City Plan. **No modification proposed.**

Dr Helen Forrest (0315)

The Council considers the population of Edinburgh is to grow and therefore additional housing is required. The Council is seeking to provide affordable housing to meet Edinburgh's needs. The Council sets out its position in detail in its responses in Issue 23: Affordable Housing. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue	20 Assessment of Housing Land Supply	
Development plan reference:	Part 2: Strategy - page 29 Housing Land Supply	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Archie Clark (0003) Barratt David Wilson Homes (0678) Barratt David Wilson Homes (0677) BDW Trading (0350) CALA Management Ltd (0465) Dandara East Scotland (0757) Esk Property LLP (0726) Hallam Land Management (0457) Hallam Land Management (0599) Hallam Land Management (0615) Homes for Scotland (0404) Inverdunning (Hatton Mains) Ltd (0427) Julie Robertson (0210) Landowner of East Foxhall (0544) Lord Dalmeny (0475) Lynn Grattage (0362) Mark Ockendon (0419) Mactaggart &amp; Mickel Homes Ltd (0312) Melford Developments Ltd (0308) Miller Homes (0256) Miller Homes Limited (0649) Mr T Klan (0307) Murray Estates (0197) NatWest (0477) Nicola McCowan Hill (0195) Persimmon Homes (0495) Robertson Residential Group (0537)</div> <div>Robertson Residential (0490) Rosebery Estate (Bankhead) (0618) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) Scottish Property Federation (0144) SEEDCo (0198) Spire Healthcare Limited (0719) Steve Loomes (0767) Stewart Milne Homes (0118) Stirling Developments Limited (0303) Tarmac (0244) Taylor Wimpey (0200) Taylor Wimpey East Scotland (0770) Taylor Wimpey and Hallam Land Management Ltd (0603) The Association for the Protection of Rural Scotland (0334) The Catchelraw Trust (0137) The Stoddart Family (0749) University of Edinburgh (0464) Watkin Jones Group (0516) West Craigs Limited &amp; Dunedin Canmore Housing Association (Wheatley Group) (0352) Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	This section of the Plan sets out the housing land supply to meet the housing land requirement.	
Planning authority's summary of the representation(s):		
<div>Archie Clark (0003)</div> <div>Questions what legacy sites are.</div> <div>Barratt David Wilson Homes (0678)</div>		

Affordability factors will be impacted by restricting the available land and restricting the supply of viable greenfield land, which will reduce the volume of housing delivered across all tenures, thereby exacerbating existing affordability issues.

Aspiring to enable people to live in a home they can afford is a misleading statement. People only live in homes they can afford, even if these homes are not suitable to meet their needs. Plan will exacerbate the existing affordability crisis and under-provides for the demand for private homes.

Lack of information presented on land supply does not allow for a precise understanding. There is no definitive list of sites counted towards meeting the land supply, there is no programming of sites showing capacity is expected to deliver over the Plan period, no schedule of legacy sites and capacities, no explanation of why sites are considered effective/deliverable, housing allocations at IBG & Bioquarter and three smaller sites were not included in the Main Issues Report and 50 of the new allocations were assessed as being unsuitable for development at the Main Issues Report stage and there is no explanation of the Council's changed position.

Position supported by a Housing Land Supply Assessment, Holder Planning, December 2021 which finds that the housing land supply can only reasonably be expected to deliver around half of the homes the Plan claims. It shows that the Council's own, non SPP compliant and deficient Housing Land Requirement (44,293) will be missed with a shortfall of 13,150 to 16,350 homes. When compared with a Housing Land Requirement which reflects full housing need and demand in HNDA 2 of around 75,000, the shortfall is in the region of 45,000 homes. Failure to meet housing targets will accelerate housing costs.

Continuing with a spatial strategy where need and demand is not met in full is likely to lead to an uneven distribution of the benefits of Edinburgh's growth. Land supply is inadequate and the Council's justification for its spatial strategy is seriously flawed.

Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

Submit an Executive Summary -City of Edinburgh Council Proposed 'City Plan' Consultation. Consider the Plan fails to provide for an adequate number and variety of opportunities for residential development and the proposed sites present a variety of delivery challenges. The Plan is therefore contrary to SPP 2014, particularly paragraph 110, 119 and it conflicts with para 15.

Strategy of only allocating new brownfield sites and re-allocating employment land is high-risk, lacks resiliency and is inflexible. A blend of brownfield and greenfield allocations would ensure that the housing demand is being met and help to deliver a consistent pipeline of new housing across all tenures year on year. The Council have failed to respond to concerns set out by Homes for Scotland and its members in response to Choices.

Restricting the available land for residential development and the supply of viable greenfield land will reduce housing delivery across all tenures either severely restricting residential development worsening the affordability challenges and/or redirecting development to locations outwith the city boundaries.

Land identified will not be capable of delivering the new homes required within the Plan period. A significant volume of the newly allocated land is active employment land. Brownfield sites often have multiple landowners and may not be financially viable for housing development. Question how the Council have satisfied themselves that the approach is deliverable. Also have availability concerns. Several sites not promoted by the landowner and no evidence of willingness to make them available. Raise concerns with the apparent lack of engagement between the Council and site owners and consider this to be contrary to the 'ownership' test of effectiveness set out in Planning Advice Note 2/2010 (PAN 2/2010). Consider there is a lack of information on methodology for analysing and processing comments previously submitted. No evidence that each site will be deliverable over the Plan period and refer to Holder Planning and Geddes submission which considers that the Plan is only expected to deliver approximately half of the homes allocated for over the Plan period and several hundred businesses would have to be displaced.

Not possible to assess which sites the Council is confident will be delivered in the short or long term as no programming is provided.

An assessment of consequences of shortfall in housing delivery should be carried out and the strategy and allocations revisited prior to Examination. Consider the flaws of the Plan to be significant and question the ability of an Examination to tackle them.

Consider that failure to properly meet need and demand influence some of the issues of affordability and traffic as households have been required to move further afield to find a home which suits their requirements. No evidence that strategy will achieve a city where you do not need a car. Restricting the available supply of well-connected greenfield sites runs directly contrary to achieving goal to become a sustainable and net zero city.

Proposals and policies are included which will restrict opportunities to bring other sustainable sites forward.

Nearly two-thirds of the total households in city live in flatted accommodation and Plan represents an opportunity to re-dress balance through an allocation of a variety of land for development.

BDW Trading (0350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Plan fails to set out a spatial strategy which can reasonably be expected to meet the housing land requirement therefore is contrary to SPP policies including paragraphs 30 and 119. Consider there is a lack of attention paid to housing delivery with no programming or definitive list of sites included in the housing land supply contrary to delivery focus in NPF 3 and SPP.

Representation is supported by a Housing Land Supply Assessment, Holder Planning, December 2021 Assessment finds that the Proposed City Plan 2030 housing land supply can only reasonably be expected to deliver around half of the homes the Plan claims with a shortfall of 13,150 to 16,350 homes and note that compared with a Housing Land Requirement reflecting full need and demand in HNDA 2 of around 75,000, the shortfall is in the region of 45,000 homes. Failure to meet housing targets will accelerate housing costs.

Large scale displacement of employment land with no coherent plans for relocation is contrary to the SDP. Greenfield land would need to be released to accommodate the displacement. Evidence base has not weighed up how the disbenefits from allocating additional housing and employment land in the greenbelt have been weighed against the loss of jobs and displacement of business. There is a disconnect between the evidence base and the spatial strategy, it is inconsistent with site assessments at MIR and other reports. Important documents are either not included or have not been made publicly available. Plan is misleading as the impact on employment and housing will be damaging to equality and prosperity. Despite points being raised at MIR stage they appear to have been discounted with no explanation. Question if consultation on land supply was meaningful or effective.

Plan promotes a spatial strategy with little consideration of whether or not it can be delivered. If it were delivered there would be significant negative economic and social consequences. Should the Plan be submitted for Examination ask that a public hearing assesses these matters. Due to shortcomings in evidence base and chosen strategy question whether the Plan should proceed to examination.

The lack of information presented on land supply does not allow for a precise understanding as there is no definitive list of sites counted towards meeting the land supply, there is no programming of sites showing what proportion of the sites' capacity is expected to deliver over the Plan period, no explanation of why sites are considered effective/deliverable, housing allocations at IBG & Bioquarter and three smaller sites were not included in the Main Issues Report and 50 of the new allocations were assessed as being unsuitable for development at the Main Issues Report stage and there is no explanation of the Council's changed position. There is no schedule of legacy sites and capacities. No indication of assumptions of how many homes will deliver over the Plan period. Programming should not be subject to information received from representation as the Plan is supposed to be the settled will of the Council. Limited information is set out on the suitability of sites, many not promoted through earlier stages of the Plan and owners only notified once the Plan was published.

Question whether the 5 housing sites should be allocated until they have been consulted upon and assessed for suitability.

Consider that the reallocation of IBG for predominantly housing is contrary to NPF3.

It is not clear to what extent the Edinburgh Commercial Needs Study: Mixed Use Delivery, December 2020 has informed the approach as it post dates MIR and is not a supporting document to the Proposed Plan. Request sight site assessment breakdown.

Delivery of sites will require step change on current delivery rates and no explanation of how this will be achieved. Threat of widespread CPO is not credible. Many sites already have a favourable policy context for housing therefore allocation is not a policy sea-change.

Calculate an expected delivery of 19,695 homes from the effective supply over the 2021-2032 period. Contribution of constrained sites of 2,140. Provides programming for IBG, Crosswinds and Bioquarter and consider they will deliver 2,400 homes over the Plan period. Provide an assessment of effectiveness and likely delivery for 92 new allocations. Consider delivery of site to be in region of 3,717-6,908 in the Plan period.

This results in a delivery assumption of 27,952-31,143. Consider that as overall supply will only deliver half of Council's assumption that affordable supply would fall short of the Council's affordable housing target.

Identify potential for double counting in the Council's land supply. There is no clear explanation of densities and capacities applied to allocations.

Significant changes required throughout outcomes section of the Proposed City Plan 2030, including the allocation of substantially more deliverable housing allocations.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Submit a Development Strategy Statement - City Plan 2030, Geddes Consulting, that examines methodology and assumptions of the proposed Pplan. Identifies significant issues in particular whether the Proposed LDP will allocate sufficient housing land to meet requirements SDP and whether it has had regard to NPF3 and SPP.

Have significant concerns regarding the selection of sites which appear to rely only on assessment process in the MIR Housing Study and there is no new evidence. Prior to publication of City Plan 2030, the Council should carry out an updated assessment to determine if any of the sites it had determined as unsuitable for housing development before publishing the Proposed LDP are now suitable for development.

Proposed sites are windfall that may or may not deliver over the Plan period. Accordingly, these should be treated as such. Many currently in active use, owned privately and are not subject to any planning intention for other uses.

No programming of housing land supply is provided beyond 2028. Suggest the extrapolated method agreed at all other SESplan LDP Examinations should be adopted.

Programming assumptions for the MIR Housing Study sites do not equate with Council's completions on brownfield sites from 2015 to 2021 which suggest that around 830 homes per annum is achievable.

Proposed LDP anticipates that all sites identified in established housing land supply and all new housing proposals will deliver 55,720 homes by the end of the Plan period however no programming is provided. Assertions set out in Table 7 of the Housing Technical Note are unsubstantiated and therefore invalid. The Council should adopt the only substantive evidence they have set out in the Housing Land Audit and Completions Programme 2021.

Assuming optimistic output from the sites that should be identified to accord with SDP1 and NPF3, the housing land supply identified in the Plan would deliver around 28,011 homes which is 29,417 homes fewer than the 57,428 homes asserted by the Council and may be optimistic based on the use of compulsory purchase powers. In terms of enabling the housing land requirement of 42,835 homes by 2032, a shortfall of at least 14,824 homes emerges. The Council should allocate land on greenfield sites to enable the delivery of at least 14,824 homes by 2032.

Concerned that the Council has introduced 5 sites -H62, H63, H64, H86, H90 that were not identified as part of the Choices in the MIR or assessed for housing development in the MIR Housing Study. Consider these should not be included as they have not been subject to public consultation at a formative stage in the process. Consequently,



participants have been significantly disadvantaged as they have not been able to engage in the way envisaged by Circular 6/2013. Should also consider the implications arising from Gunning Principles.

Accept that H86 Edinburgh BioQuarter has an element of housing development however, the scale of development has been confirmed at 600 homes and not 2,500 homes set out by the Council. Both Proposal H62 Land adjacent Edinburgh Gateway and Proposal H63 Edinburgh 205 are contrary to SDP1 and NPF 3 and cannot be included.

The proposed development strategy will not maintain a five year effective housing land supply at all times over the development plan period to 2032.

Consider no evidence has been set out to demonstrate strategy can be delivered and lack of this information undermines the representation process.

Given the scale of deficiency and inconsistency presented in the Proposed LDP suggest the Council modify and reconsult on its proposed development strategy prior to submission to the Scottish Ministers for Examination. Consider the most appropriate spatial strategy to meet its housing land requirement is a blended approach.

#### Esk Property LLP (0726)

Recognise the importance of developing brownfield land but consider the approach of meeting all of Edinburgh's housing need, including for care and retirement-living type developments, solely on brownfield land to be unrealistic and high-risk and will fail to address housing need and demand during the City Plan period.

Notable that within the Spatial Strategy, no reference is made to the provision of age restricted development and if these uses have been incorporated into overall housing land figures there is a lack of recognition of how this will disadvantage the development of specialist care/housing sector as the land values involved are very different from mainstream housing. Unless there is specific provision made within land allocations for housing, the care and housing for older people sector will not be able to access development opportunities as they cannot pay the same prices for sites as mainstream housebuilders and residential developers.

No evidence to indicate that the effectiveness and deliverability of sites has been considered or subject to a robust assessment. Many of the new housing proposals will fail to meet the test of effectiveness contained within PAN2/2010.

To ensure a deliverable supply of housing land, including for care and retirement living type developments, the Council must consider the release of some land within the green belt.

#### Hallam Land Management (0457)

Over-reliance on brownfield sites will result in a housing land shortfall and compulsory purchase requirements. Several of the housing allocations have not been brought forward by landowners themselves therefore there is no evidence that landowners will be willing to make these sites available for development. Approach avoids exploring legitimate opportunities for green belt / countryside release, puts extra pressure on Council and the housebuilding industry to deliver housing within constrained brownfield sites, fails to meet

requisite housing need and demand, promotes high density brownfield development within city, fails to take account of the changing needs of the housing market and ignores opportunities for phased release of suitable and sustainable greenfield sites. Approach is overly restrictive and lacks the degree of flexibility needed to accommodate wider aspirations. Based on current delivery rates of constrained sites consider that it is not achievable to deliver all constrained sites within plan period.

Julie Robertson (0210)

Consider that knocking down existing businesses for housing, pushes too many businesses out of the localities, making people travel further. Harry Lauder Road areas and Salamander Street have lost many businesses and gained very many new residents, but not sure that these are good quality spaces for living in or have the necessary infrastructure to support such a large change in society.

Hallam Land Management (0615), Tarmac (0244)

Submit a supporting document - City Plan 2030 Proposed LDP Response to Housing Technical Note. Consider that sustainability, delivery and affordability factors will be affected by strategy and policies. Reserve the right to defer to evidence provided by Homes for Scotland and Scottish Property Federation as part of their representation.

Consider that the Plan suppresses demand through its spatial strategy. Insufficient land is provided. There is little evidence that housing policies in City Plan will provide required housing in mixed-use sustainable communities where there is infrastructure capacity and that this provision can be part of a sustainable 20-minute neighbourhood.

Consideration of re-use and redevelopment is not sufficiently robust or sound enough to rule out greenfield land. There is no objective evidence of optimising existing available infrastructure or resource capacity. No land has been used adjacent to settlements to the detriment of potentially sustainable sites. Development on the proposed sites would have negligible amenity or economic benefits by introducing high density development and dispersing local jobs.

Express doubt regarding the feasibility, viability and deliverability of the sites. Consider that overestimation of housing sites, capacities and delivery has restricted the need for additional sites. High level of generosity in housing land supply of 56% makes the methodology for calculation to be dubious irrespective of the policy drivers and spatial strategy and re-enforces the inherent weakness in allocating land that is not necessarily available for development and will take time to assemble and market.

Consider established supply for 33,000 homes to be an overestimate as a proportion of the sites identified in the Housing Land Audit and Completions programme 2021 are unlikely to come forward during the Plan period. Delivery through SHIP and CPO is risky and not reflected in any tangible policy commitment.

Contribution of private rent, build to rent and the role of Edinburgh Living is not underpinned by analysis. Performance in this sector is unclear based on the level of applications in this sector and cannot be treated more than windfall.

Densities identified within the allocated sites are unlikely to be achieved and despite the generosity allowance this is likely to result in a shortfall of supply over the Plan period.

Objects to the manner in which the housing land requirement and spatial strategy has developed from Option 12 of Choices. Concerned that matters relating to West Edinburgh have been manipulated to artificially create housing land at the expense of economic growth and requests that the Council reviews these aspects of the LDP.

#### Inverdunning (Hatton Mains) Ltd (0427)

Submit a supporting document - Representation to Proposed (Edinburgh) City Plan 2030 Supporting Document & Appendices, December 2021. Consider that there is a lack of deliverability across a large proportion of the proposed housing allocations. Of the new sites, which theoretically provide for 25,000 homes, only around a third of this capacity (8,000 homes) is realistically deliverable in the Plan period. Sites for over 7,000 homes are currently occupied by existing business who have voiced their opposition to plans to relocate them, resulting in likely lengthy CPO requirements. Half of these active business sites are in multiple ownership. Land proposed for over 10,000 homes will not be available in the Plan period or cannot be phased in the timescale. There is an estimated shortfall of between 12,000 homes, if using the Council's demand figures put forward to NPF4, and 30,000 homes, if increasing affordable targets.

Allocations will not provide a range of sites or sufficient land to meet housing targets. There is a lack of deliverability across many sites and considers there are options for sustainable greenfield development.

Set out two options for housing targets and land requirement. Consider that both options result in a significant shortfall in housing allocations based upon an assessment of deliverability. Land for over 10,000 homes will not be available in the period and cannot be phased in the timescale.

Of the 95 sites allocated, 54 are potential windfall only with no commitment to housing therefore specific references should be removed. Consider that a general windfall allowance would allow for a proportion of these sites to come forward, note that none are committed for housing. It is not apparent that any of the 54 windfall sites have a high probability of development. No contact with site owners, timescale and resource for CPO is not deliverable within the Plan period.

Astley Ainslie and Redford are not available in the Plan period and Royal Victoria hospital may not be available. Suggest a further 6 sites to be reduced in size/capacity to reflect land ownership control.

Cannot deliver targets on brownfield approach alone and new sustainable communities are needed. Additional sites will require to be brought forward and option of new settlements should be included, in line with SPP 2014.

#### Landowner of East Foxhall (0544)

Consider that a brownfield only strategy will not provide sufficient housing delivery across the Plan period. There is no justification of delivery and strategy should be amended to include a more balanced approach, including greenfield allocations.

Need to be ensured that allocated sites are also appropriate for the market and are therefore deliverable. Allocating sites with high density do not deliver required numbers.

Consider this is a relevant consideration for the majority of brownfield sites as they are in urban areas where density is already high and require flattened development to be delivered, which is not what the market requires.

Should provide for a range of housing types to ensure that an appropriate mix of housing is available, but also one which the market is able to both deliver and sell.

Currently allocated sites within the adopted Edinburgh Local Development Plan (November 2016) should be reviewed to ensure that all sites remain deliverable. A large proportion of sites are currently within active employment use, and they may have no intentions for relocation. Question whether sites will be able to come forward for delivery within the Plan period, even with the CPO powers. Request further consideration of the deliverability of sites.

Lord Dalmeny (0475)

Consider dependence on brownfield sites is seriously flawed. Suggest that the contribution of brownfield sites is overestimated. The Plan fails to recognise that a significant proportion of the brownfield land that is proposed for housing purposes is currently occupied by other uses. Environmental Report confirms that Edinburgh has a relatively low incidence of vacant and derelict land compared with other Central Belt authorities; high land values and pressures for development means that land tends to be re-used quickly. CPO is costly and time consuming process which is unlikely to deliver timeous supply of housing land.

Lynn Grattage (0362)

Does not agree developments should be mainly brownfield and farms within the city boundary should be compulsory purchased and have communities complete with facilities.

Mark Ockendon (0419)

Considers that any new housing should be on the outskirts of the city, away from the culturally historic areas.

Mactaggart & Mickel Homes Ltd (0312)

By seeking to provide new homes on existing and operational employment land the Council will not meet its basic aim of providing more homes, ensuring they are affordable, in the most appropriate location to allow and facilitate future economic growth. City Plan highlights the greatest requirement is for affordable housing in paragraph, however, without any controlled or limited greenfield housing land release via a blended brownfield and greenfield strategy, the Council's stated strategy is going to exacerbate the affordable housing need, yet further. Pursuing new housing on existing and operational employment land present planning challenges before they can eventually be developed. This may in turn lead to a situation where the level of affordable housing that can be offered, on any of the new strategic housing led developments will be far less than 35%. This encapsulates the flawed strategy.

#### Melford Developments Ltd (0308)

Consider that the Plan potentially increases the affordability crisis in the city by restricting available land for housing and orientating these on more difficult sites.

Some of the land allocated is not on the market or available for development as there are ongoing viable businesses accommodating these sites. Consider the strategy is high risk and potentially undeliverable.

Caution that the emphasis of retrofitting neighbourhoods in an urban and often historic context must not be underestimated, as opposed to establishing hubs in more feasible and viable greenfield locations. Concerned that the Council is constraining land and unduly intervening in the property market. Council's role as landowner and planning authority raise issues of issues of impartiality and conflict of interest.

Consider the impact of plan will be to raise development costs, increase the price of land, make the decision making process more complex and lengthier, and make much of the land in the city unviable for development. Brownfield land first approach seriously underestimates the difficulty with implementation.

The spatial strategy is reliant on sites that are now identified for development which are already in the hands of landowners with development interests. Given current land shortages demand and price will rise which, together with rising development costs will create supply difficulties further constraining the market.

Consider there is a failure to understand land economics and a high percentage of sites may not come forward for housing given existing site uses and CPO cannot be relied upon and should be a means of last resort.

Consider that Council must be more flexible with its overall allocations throughout the city if it wishes to encourage urban re-development and sustainability.

#### Miller Homes (0256)

Consider that strategy of City Plan will not maintain a five year effective housing land supply at all times over the development plan period to 2032 and a blended approach whereby the Council would deliver more land in the urban area and release some land from the Green Belt and the allocation of Riccarton Village could address the flaws identified in the City Plan.

#### Mr T Klan (0307)

Plan does not identify sufficient land that can be delivered over the Plan period in an appropriate mix and type of location. Wish to see greater scrutiny and assessment of the supply figures. Dubious that brownfield and legacy sites can deliver anything approaching the levels predicted.

Not feasible to deliver the required development in time and on budget with a brownfield only approach.

#### NatWest (0477)

Many brownfield sites allocated may not come forward for development as some allocated sites have no evidence landowner's support, there is a reliance on sites carried over from

the Edinburgh Local Development Plan 2016 that suffer from high barriers to development and compulsory purchase is too time consuming to rely on. A more balanced approach with brownfield and greenfield release required.

#### Nicola McCowan Hill (0195)

Plan fails to provide for an adequate number and variety of opportunities for residential development and the sites present a variety of delivery challenges. Plan has not made proper provision even for the number of homes the Council is itself aiming for, let alone the full level of need and demand identified in HNDA2. Plan is therefore contrary to SPP, particularly paragraph 15, 110 and 119. Includes many proposals and policies which will detrimentally affect the viability of sites, restrict opportunities to bring other sustainable sites forward which is likely to either severely restrict residential development or redirect development to locations outwith the city boundaries, forcing higher levels of commuting and impacting on affordability by reducing the volume of housing delivered across all tenures. The Plan also imposes unrealistic density requirements that will lead to an overprovision of smaller, flatted sites, and an under provision of larger, family homes.

Has viability and availability concerns over sites, many of which have not been put forward by landowners and consider that abnormal costs may result in land value close to nil, or very low leaving nothing for developer contributions. Asks how contributions will be procured without a 'roof tax' style infrastructure levy. Questions if the Council is under-planning.

Refers to evidence submitted by Holder Planning and Geddes Consulting which shows sites will yield only about half of the homes which the Council is relying on them to deliver by 2032.

Request that an assessment of consequences of shortfall in housing delivery is carried out and strategy and allocations revisited prior to Examination. Consider the flaws of the Plan to be significant and question the ability of an Examination to tackle them.

The importance of home building to the economy is not fully recognised.

City Plan is too reliant on existing employment land and a wider variety of housing land requires to be allocated or otherwise given policy support and this should include greenfield land. Considers release and coordinated delivery of greenfield sites can better support sustainable development, and the creation of 20-minute neighbourhoods.

#### Robertson Residential Group (0537)

Over-reliance on brownfield sites will result in a housing land shortfall and compulsory purchase requirements. Several of the housing allocations have not been brought forward by landowners themselves therefore there is no evidence that landowners will be willing to make these sites available for development. Approach avoids exploring legitimate opportunities for green belt / countryside release, puts extra pressure on Council and the housebuilding industry to deliver housing within constrained brownfield sites, fails to meet requisite housing need and demand, promotes high density brownfield development within city, fails to take account of the changing needs of the housing market and ignores opportunities for phased release of suitable and sustainable greenfield sites. Approach is overly restrictive and lacks the degree of flexibility needed to accommodate wider aspirations. Based on current delivery rates of constrained sites consider that it is not

achievable to deliver all constrained sites within plan period. Refer to Housing Land Supply Assessment, Holder Planning, December 2021, which shows City Plan 2030 can be expected to deliver between 29,100 and 31,100 homes from the existing and proposed Housing Land Supply within Plan period and demonstrates that the Council's current position that all constrained sites will be delivered in the Plan period is far from achievable.

Rosebery Estate (Bankhead) (0618)

Welcome support for other sites in the urban area but needs to be part of a balanced development strategy to ensure that there is an ongoing supply and choice of apartments and family housing.

Brownfield only approach is unrealistic. Brownfield sites often have multiple landowners, and it can be difficult to align aspirations amongst multiple parties. Some have many more constraints than others.

Consider there is a lack of information provided regarding the methodology for analysing and processing the comments previously submitted.

A significant volume of the newly allocated land is active employment land. Consider the approach is high-risk, lacks resiliency and is inflexible.

Housing Land Supply Assessment, Holder Planning, December 2021, which finds that the City Plan Proposed Plan housing allocations can only be reasonably be expected to deliver around half of the homes the Plan claims.

Have sustainability concerns as restricting the available land for residential development will push people away from the city into the surrounding towns and villages, forcing longer commutes.

Note that no programming is provided for the sites therefore not possible to assess which sites will be delivered in the short term, and which sites may take longer to come forward. Not all of the brownfield sites allocated are currently within easy access of a bus stop or train station,

The Council's report analysing the 2011 Census, Topic summary: Housing: dwelling type, tenure, rooms, overcrowding and under-occupancy" (February 2014) states that nearly two-thirds of the total households in the city live in flatted accommodation. This is very high, compared to other parts of Scotland. This Plan represents an opportunity to re-dress this balance, through an allocation of a variety of land for residential development.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Draft NPF4 sets out that plans should have a focus on the delivery of housing at all stages of the Plan making process and beyond into the delivery role of the plan. The Council should consider how the proposed plan will establish a deliverable housing land pipeline as set out in draft NPF4.

Scottish Property Federation (0144)

Consider that brownfield sites are not always a viable option for development without very significant long term remediation, or infrastructure investment and could conflict with the

intended purpose of delivering more homes, including affordable homes as well as related employment opportunities and community facilities.

The strategy for achieving affordable housing targets through use of CPOs on employment land sites is not likely to achieve the stated targets within the intended timescales. Consider aspirations for rate of production and the delivery of sites is unrealistic and highly dependent on recently added proposals which were previously allocated to employment uses.

Would like to see a more realistic analysis of the rate of production of new homes, including affordable housing. Would be helpful to see an analysis of alternative strategies should the primary policy of reallocation of new employment and in-use employment sites fail to deliver the scale and rate of housing supply proposed by the plan.

#### Spire Healthcare Limited (0719)

Brownfield strategy is overly restrictive, does not reflect challenges in developing such sites, will lead to less housing completions overall, result in a housing land shortfall and affect the delivery of housing for older people / specialist housing.

Should be greater support for delivering housing for older people allowing for allocations for such housing or care homes on greenfield sites that are well located to the services, facilities and public transport. Costs of delivery are generally greater than for mainstream housing and higher costs on brownfield land will be challenging.

Concerned that as many of the sites have not been put forward by owner, there no guarantee of delivery. A greater number of appropriate sites should be supported by the strategy / aims and by new allocations on greenfield sites.

NPF4 requires a deliverable housing land pipeline to be established for the Housing Land Requirement and more land should be allocated to meet the Housing Land Requirement in sustainable locations that people want to live.

#### Stirling Developments Limited (0303)

Requirements within place policies for master plan / place brief suggests that sites will not be able to come forward for development early in the Plan period. Must therefore consider existing, effective sites that already have masterplans and briefs that can be extended. Inclusion of additional greenfield sites should be considered as part of a holistic plan for West Edinburgh.

The Plan needs to incorporate flexibility to allow effective greenfield sites to support the delivery of housing. A wider variety of housing land requires to be allocated or otherwise given policy support.

The Plan is too reliant on existing employment land to deliver the housing mix and volume proposed. Greenfield land has been such an important contributor to housing delivery in Edinburgh under the current and previous plans and the proposed strategy risks failure to deliver on its housing targets.



Clarity is sought on section 1.4 and how the figure of 20,000 affordable homes will be delivered. In the context of the wider plan, many of these affordable homes will be delivered as part of a mixed tenure scheme. Concerned that if private housing is constrained, affordable housing will be as well and the target will be unachievable.

#### Taylor Wimpey East Scotland (0770)

Approach of meeting all of Edinburgh's housing need solely on brownfield land is unrealistic and high-risk and will fail to address housing need and demand during the Plan period. No evidence to indicate that the effectiveness and deliverability of sites has been subject to a robust assessment. Many of the new housing proposals will fail to meet the test of 'effectiveness' contained within PAN2/2010.

Approach to site selection does not comply with either SPP or Circular 6/2013.

Essential that additional land is allocated for residential development on appropriate and available greenfield land if a sufficient volume and range of homes are to be built during the Plan period. Consider that this can be identified and planned in a manner that would support the key aims of City Plan 2030.

Refer to Housing Land Supply Assessment, Holder Planning, December 2021, as justification for the need to allocate additional sites.

#### Taylor Wimpey and Hallam Land Management Ltd (0603)

Object to the City Plan housing strategy in its current form. Sites allocated do not deliver the number of homes and affordable homes to meet identified needs, could push prices beyond people on average salaries and will displace a significant part of commercial employment base beyond the city.

Refers to Taylor Wimpey's submissions in respect to the Housing Land Requirement and the supply of housing which considers there is a shortfall in allocated housing sites.

Points to evidence in Homes for Scotland's response to the Proposed City Plan 2030 on why pursuing an all-brownfield strategy will result in housing need and demand being significantly unmet.

Spatial strategy should be amended to adopt a blended approach to the allocation of deliverable greenfield and brownfield land which is sufficient to meet housing need and demand.

#### The Association for the Protection of Rural Scotland (0334)

Support the allocation of land, well above the amount required by the housing supply targets and the minimum all tenure Housing Land Requirement in draft NPF4. Express disappointment that circumstances require the allocation of larger amounts of land for market housing in order to achieve a target amount of affordable housing which seems at odds with policies to use land and resources more efficiently.

#### The Catchelraw Trust (0137)

Consider that there is an over reliance on non-deliverable brownfield sites that will lead to under-delivery of homes. Should be a blend of greenfield and brownfield sites to ensure a

continual five year supply of a range of house types. Lack of supply will ensure the lack of affordable housing delivery and further unsustainable house price inflation for open market homes.

The Stoddart Family (0749)

Plan does not provide a range of sites and is reliant on high density previously developed land to provide for its housing need. Does not consider any of the sites to be guaranteed effective. Questions if relocation of businesses which would result is a sustainable approach. Consider Plan is non-compliant with SPP 2014 requirement to allocate a range of sites which are effective or expected to become effective in the Plan period.

Support the position of Homes for Scotland in terms of their objections raised to the proposed plan.

University of Edinburgh (0464)

In addition to the need to ensure an appropriate supply of purpose built student housing to meet current and future need and demand, wider housing tenures are also of relevance to the University of Edinburgh. This relates to the need to maintain a range of housing suitable for staff at all levels within the University, as well as for more mature students, couples or family housing where mainstream student accommodation is not suitable.

A functioning and healthy housing market is key to attracting and retaining staff, and this includes access to affordable solutions, and in locations that are accessible to university facilities.

The Plan introduces an ambitious and laudable approach to housing policy in seeking to maximise the use of brownfield land rather than greenfield. The University of Edinburgh support this aim, however caution that the approach needs to be deliverable, and to meet the expected housing requirements throughout the lifetime of the plan.

Many of the identified brownfield housing land opportunities are currently in active alternative use and with no immediate prospect of conversion to housing which is likely to place additional pressure on available and deliverable sites, which may result in continued, and aggressive inflation of land values, if demand continues to outstrip supply.

Watkin Jones Group (0516)

Support aim to maximise the use of brownfield land rather than greenfield however caution that the approach needs to be deliverable and meet the expected housing requirements. Consider that the identification of brownfield housing land opportunities currently in active alternative use and with no immediate prospect of conversion to housing likely to place additional pressure on available and deliverable sites which may result in inflation of land values, if demand continues to outstrip supply.

West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352)

Consider the approach of meeting all of Edinburgh's housing need on brownfield land to be unrealistic and high-risk and will fail to address housing need and demand during the Plan period.

No evidence to indicate that the effectiveness and deliverability of these sites has been considered or subject to a robust assessment. Many of the new housing proposals fail to meet the test of 'effectiveness' contained within PAN2/2010: Affordable Housing and Housing Land Audits.

Note that at Choices for City Plan stage of 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares was vacant and ready for development and only 30 hectares benefitted from planning permission. The remainder of the land was in active alternative use – primarily business and industrial land in private ownership. There is no evidence that this position has changed significantly in the intervening period.

Question if the Council considered circumstances where due to existing industrial use value it would not be financially viable to sell for housing. The success of the Plan's spatial strategy is reliant on a range of commercial factors outwith the Council's control.

Considers that on the evidence available City Plan's approach to site selection does not comply with SPP 2014 or Circular 6/2013 and there is a lack of documents to allow for proper scrutiny.

An alternative option must be pursued if Edinburgh's housing targets are to be met which necessitate development on both greenfield and brownfield land. Considers release and coordinated delivery of greenfield sites can better support sustainable development, and the creation of 20-minute neighbourhoods.

#### **Modifications sought by those submitting representations:**

##### Archie Clark (0003)

No modification specified but representation suggests that the term "legacy sites" should be defined in the plan.

##### Barratt David Wilson Homes (0678), Mactaggart & Mickel Homes Ltd (0312)

Amend spatial strategy to adopt a blended approach to the allocation of deliverable greenfield and brownfield land which is sufficient to meet housing need and demand.

##### Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Homes for Scotland (0404), Nicola McCowan Hill (0195), Steve Loomes (0767), The Stoddart Family (0749), Wright PDL (0078)

Allocate a greater volume and range of land to include greenfield, particularly in accessible areas that do not result in the displacement of businesses.

##### BDW Trading (0350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Amend spatial strategy to adopt a blended approach to the allocation of deliverable greenfield and brownfield land which is sufficient to meet housing need and demand.

Replace table on p. 29 entitled 'Housing Land Supply' with table showing realistic housing delivery

Make consequential changes to the spatial strategy, including the allocation of substantially more deliverable housing allocations.

Amend Housing Technical Note to set out a full list of sites the Council is relying on in its land supply and programming for them.

Should set out detailed evidence to justify the density assumptions.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Continue to adopt the existing policy framework set out in the adopted LDP which has regard to the land use at H61 *Crosswinds*, H63 *Edinburgh 205* and H62 *Land adjacent Edinburgh Gateway*.

Remove H62, H63, H64, H86, H90 as they were not identified as part of the Choices in the MIR or assessed for housing development in the MIR Housing Study.

Allocate land on greenfield sites to enable the delivery of at least 14,824 homes by 2032.

Esk Property LLP (0726)

Consider the release of some land within the green belt to ensure a deliverable supply of housing land, including for care and retirement living type developments.

Hallam Land Management (0457)

Amend aim 2 to read

‘the Plan will meet these aims through: ‘Allocating sufficient housing land, comprising a mixture of brownfield and greenfield land, improving and re-imagining Edinburgh’s neighbourhoods, rebuilding the city from within and delivering new communities in Edinburgh Waterfront, West Edinburgh and on other major development sites across the city.’

Hallam Land Management (0615), Tarmac (0244), Mr T Klan (0307)

Revert to the blended brownfield / greenfield approach suggested in Choices.

Inverdunning (Hatton Mains) Ltd (0427)

Table 7, Housing Land Supply – For Option 1, amend:

	<b>2021-2032</b>
Housing Supply Target	54,068
Generosity Allowance	13,517 (25%)
A - Housing Land Requirement	67,585
Effective Supply 2021-28 (HLA21)	16,573

Effective Supply 2028-32*	3,275
Total Effective Supply	19,848
Contribution from Constrained Sites**	2,880
Contribution from Windfall Sites***	5,000
<b>B - Total Supply from existing sources</b>	27,728
Required new LDP allocation (A-B)	39,857
Proposed LDP allocation****	8,000
Residual Surplus/Shortfall	-31,857

Table 7, Housing Land Supply – For Option 2, amend:

	<b>2021-2032</b>
Housing Supply Target	38,500
Generosity Allowance	9,625 (25%)
A - Housing Land Requirement	48,125
Effective Supply 2021-28 (HLA21)	16,573
Effective Supply 2028-32*	3,275
Total Effective Supply	19,848
Contribution from Constrained Sites**	2,880
Contribution from Windfall Sites***	5,000
<b>B - Total Supply from existing sources</b>	27,728
Required new LDP allocation (A-B)	20,397
Proposed LDP allocation****	8,000
Residual Surplus/Shortfall	-12,397

\*rolled forward HLA21 programming

\*\*35% allowance from HLA21 sites (8228 units), as per 2016 LDP %

\*\*\*500pa allowance based on previous windfall completions in period 2015-21, HLA21

\*\*\*\*Proposed City Plan 2030 allocates 24,938 units across 95 sites but as detailed in Appendix 1 – Proposed City Plan Sites Assessment, 54 sites (-6,379 units) should be deleted as they comprise potential windfall sites only and are allowed for in general windfall allowance, 3 sites (-1,660 units) should be deleted as not available in plan period and 3 sites should have reduced capacities deliverable in plan period (-9,000 units). Allocated sites where capacities have been increased through consents have been adjusted. Net estimated delivery of 7,900 units from allocated sites has been rounded up to 8,000.

2.2 (2) – Amend line 1: “Directing new development to brownfield land and a limited number of greenfield new sustainable community locations”...

2.59 – Amend line 2: “The boundaries of the green belt shown on the Proposals Map are amended from the 2016 Local Development Plan to reflect the need for new sustainable communities”.

2.110 – Amend line 1: “To support delivery of a mixed brownfield and sustainable greenfield site approach and provide the right type and number of homes that we want requires everyone to work together proactively.

2.112 – Amend line 1: “City Plan’s spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas or new sustainable community locations where there is good public transport, including tram and express bus service.”

2.85 – Amend line 1: delete “To achieve this, City Plan seeks to improve air quality in the City, reducing emissions by promoting an approach based upon 20-minute neighbourhoods, a modal shift away from private car travel, supporting zero carbon energy schemes, and by increasing the City’s capacity for air purification through its green infrastructure proposals.

2.88 – Extend line 2: “The City Plan spatial strategy prioritises new homes on brownfield land and redevelopment of existing areas. in addition to a limited number of identified new sustainable communities”.

2.100 – Add line at end: “However, the Plan seeks to address an increased proportion of affordable demand by allocating sufficient land for mixed-tenure housing subject to the associated affordable housing policy.”

Julie Robertson (0210)

No modification specified.

Landowner of East Foxhall (0544)

Provide a range of brownfield and greenfield land.

Lord Dalmeny (0475)

Amend paragraph 2.2, point 2 to clarify the timescale for and mechanism by which City of Edinburgh Council intends to secure delivery of such ‘brownfield sites’.

Lynn Grattage (0362)

Farms within the city boundary should be compulsory purchased and have communities complete with facilities.

Mark Ockendon (0419)

No modification specified however representation infers allocation of sites and policy to direct new housing to the outskirts of the city, away from the culturally historic areas.

Melford Developments Ltd (0308)

More flexible with allocations throughout the city.

Miller Homes (0256)

Allocate greenfield sites.

Mr T Klan (0307)

At aim 2 add South East Edinburgh to list of new communities.

NatWest (0477)

Include greenfield and brownfield allocations.

Robertson Residential Group (0537)

Amend aim 2 to “Allocating sufficient housing land, comprising a mixture of brownfield and greenfield land, improving and re-imagining Edinburgh’s neighbourhoods, rebuilding the city from within and delivering new communities in Edinburgh Waterfront, West Edinburgh and on other major development sites across the city. In addition, it is clear that to meet the City’s needs a range of different sites, sizes and tenures will be required in order for CEC to have a deliverable HLS and therefore meet their eventual HLR”

Robertson Residential Group (0537), Hallam Land Management (0457)

Revise paragraphs 2.104 – 2.110 and the associated housing land requirement table (page 28) and housing land supply table (page 29) to reflect a strategy which focuses on allocating both brownfield and greenfield housing sites to ensure a significant shortfall to housing land does not result within the Plan period.

Amend [aragraph 2.88 on page 26 to read:

‘We want our homes to be accessible, affordable, well designed and energy efficient with the right homes in the right places supported by local facilities. The City Plan spatial strategy makes provision for the development of new homes on brownfield land, supplemented by suitable greenfield land to ensure adequate and effective housing land is available for development within the Plan period’.

Rosebery Estate (Bankhead) (0618)

Allocate additional land on a range on sustainably located greenfield sites.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The Council should consider how the proposed plan will establish a deliverable housing land pipeline as set out in draft NPF4.

Scottish Property Federation (0144)

Provide more realistic analysis of the rate of production of new homes, including affordable housing.

Spire Healthcare Limited (0719)

Allocate more land to meet the housing land requirement

Amend Aim 2 to “ Maximising the use of brownfield land as the preferred option for new development but supported by appropriate greenfield sites in sustainable locations, with an overall focus on improving and re-imaging Edinburgh s neighbourhoods, rebuilding the city from within and delivering new communities in Edinburgh Waterfront, West Edinburgh and on other major development sites across the city. A broad mixture of dwelling sizes and tenure types (including for homes for older people) should be supported to ensure the housing needs for all of the City’s residents are met.”

Paragraphs 2.104 2.110 (page 28 & 29) and the associated City Plan housing land requirement table (page 28) and housing land supply table (page 29) should be revised to reflect a strategy which focuses on allocating both brownfield and greenfield housing sites to ensure a significant shortfall to housing land does not result within the Plan period.

Amend housing outcomes on page 26 to:

“We want our homes to be accessible, affordable, well designed and energy efficient with the right homes in the right places supported by local facilities. The City Plan spatial strategy makes provision for the development of new homes on brownfield land, supplemented by appropriate greenfield land close to services and facilities, to ensure adequate and effective housing land is available for development within the Plan period.”

Stirling Developments Limited (0303)

Include additional greenfield sites as part of a holistic plan for West Edinburgh.

Incorporate flexibility to allow effective greenfield sites to support the delivery of housing.

Taylor Wimpey East Scotland (0770)

Adopt alternative strategy which makes provision for housing development on both greenfield and brownfield land.

Taylor Wimpey and Hallam Land Management Ltd (0603)



Provide a combination of brownfield and greenfield sites identified within City Plan 2030.

The Association for the Protection of Rural Scotland (0334)

No modification specified.

The Catchelraw Trust (0137)

Provide a blend of greenfield and brownfield sites to ensure a continual five year supply of a range of house types.

University of Edinburgh (0464)

No modification specified.

Watkin Jones Group (0516)

No modification specified.

West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352)

Provide for housing development on both greenfield and brownfield land.

#### **Summary of responses (including reasons) by planning authority:**

##### **Existing land supply**

Barratt David Wilson Homes (0678), Barratt David Wilson Homes (0677), BDW Trading (0350), CALA Management Ltd (0465), Dandara East Scotland (0757), Hallam Land Management (0457), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Landowner of East Foxhall (0544), Miller Homes Limited (0649), Mr T Klan (0307), Murray Estates (0197), Nicola McCowan Hill (0195), Persimmon Homes (0495), Robertson Residential (0490), Robertson Residential Group (0537), Rosebery Estate (Bankhead) (0618), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Taylor Wimpey East Scotland (0770), The Stoddart Family (0749), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Wright PDL (0078)

Paragraph 117 of SPP 2014 (CD096) sets out that the housing land requirement can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the Plan period, sites with planning permission, proposed new land allocations, and in some cases an element of windfall.

Allocations in the adopted Edinburgh Local Development Plan 2016 (CD039) will continue to deliver housing in the period of City Plan. Relevant sites have been carried forward and are identified as legacy sites. These are set out in Part 4, Table 2 of the Plan. Capacities have been adjusted to take account of existing allocations.

An assessment of the established land supply against the criteria contained in PAN 2/2010 (CD118), identified that as at 31 March 2021 there was land free of planning constraints for 22,411 dwellings. It identifies an established land supply of 32,380.

The established land supply includes constrained sites. There were 8,139 constrained units at 2021. Many sites considered to be constrained at the present time are affected by short term constraints which may quickly be overcome. Sites are constrained through ownership/control of the site, landowner not currently marketing for development or site currently in use for non-housing.

Since the Edinburgh Local Development Plan 2016 was adopted of the 26 sites categorised as constrained (8,800 units), 17 have become effective (2,600 units). Programming of sites recognises the capacity of constrained sites to become effective over the Plan period. **No modification proposed.**

### **Identification of sites**

Barratt David Wilson Homes (0678), BDW Trading (0350), CALA Management Ltd (0465), Hallam Land Management (0457), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Landowner of East Foxhall (0544), Lord Dalmeny (0475), Mactaggart & Mickel Homes Ltd (0312), Melford Developments Ltd (0308), Miller Homes Limited (0649), Mr T Klan (0307), Murray Estates (0197), Nicola McCowan Hill (0195), Persimmon Homes (0495), Robertson Residential (0490), Robertson Residential Group (0537), The Stoddart Family (0749), Rosebery Estate (Bankhead) (0618), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Taylor Wimpey East Scotland (0770), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Wright PDL (0078)

Para 119 of SPP 2014 (CD096) states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the Plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the Plan period and that the range of sites allocated will enable the housing supply target to be met.

To determine the additional land required to meet housing land requirement of 44,293 the existing land supply was deducted from the requirement identifying a need for additional sites to be allocated.

SDP 1 (CD087) sets out a spatial strategy for Edinburgh and the South East to 2032. It steers housing growth to sustainable locations where there is infrastructure capacity or which minimise the requirement for additional investment. City Plan's spatial strategy directs new development to, and maximises the use of, brownfield land rather than greenfield land. Spatial strategy is dealt with under Issue 2.

An assessment of urban brownfield land was undertaken to identify land with potential for housing development and estimate the housing capacity that could be delivered on that

land, this is detailed in the City Plan Choices Housing Study (CD026). Densities applied and a methodology are set out within the study and are consistent with the City Plan aims.

Ryden Mixed Use Delivery Study (CD036) considered the potential impacts of a brownfield approach. Its focus was on industrial sites. The majority of sites identified in Choices (CD022) are not industrial, including for example smaller sites such as former community centres and gap sites, and larger sites such as cleared housing land, car showrooms, and former hospitals. For the purpose of policy development and not a definitive opinion on each site, the Ryden study categorised industrial sites into two categories of short to medium term redevelopment potential and medium to long term redevelopment potential.

Sites identified in Choices (CD022) were further considered prior to the proposed Plan to take into account changes in planning status, development activity, Choices consultation comments, SEA, intentions of public sector land owners and other site factors.

Of the 162 sites identified in Choices, 86 have been taken forward into City Plan.

In addition to the urban brownfield sites, strategic sites are identified -H59, H60, H61, H62, H63, H55 and H86. These sites are larger scale or part of a grouping of sites. The inclusion of specific sites is dealt with under Issues 4-8 Proposed Sites.

Methodology used to determine indicative capacities for allocated brownfield sites is set out in the City Plan Choices Housing Study (CD026). A range of density bands were developed based on existing planning approvals in the Council's area over the last 10 years and the anticipation that higher densities could be achieved subject to changes in existing planning policies and guidance resulting from City Plan. Notably zero or very low car parking in areas of high public transport accessibility and that sensitive architectural design and site layouts could achieve higher densities than the prevailing character of an area.

Site specific analysis undertaken prior to the proposed Plan considered detailed factors including building heights, views, site conditions, environmental and other physical constraints. This has resulted in adjustment of capacity of some sites. Adjusted capacities take account of any requirements for the provision of school infrastructure.

Capacity of proposed sites have been adjusted to take account of existing allocations. Open Market Shared Equity are existing homes currently in the market sector that are purchased under shared equity arrangements, and they form part of the calculation of what the housing target should be. There is no double counting in the site capacities.

Capacities for strategic sites have been estimated based upon discussions with owners/developers on a site by site basis. The capacities are considered achievable. Capacities of individual sites are considered under Issues 4-8 Proposed Sites. **No modification proposed.**

Lynn Grattage (0362)

New allocations have been made in line with the spatial strategy which directs new development to brownfield land and existing allocations. This includes delivering new communities in Edinburgh Waterfront, West Edinburgh and other major development sites.

Policy Inf 1 Access to community facilities supports development where key community facilities are walkable within a 20-minute return trip. **No modification proposed.**

### **Total Housing Land Supply**

Barratt David Wilson Homes (0678), Barratt David Wilson Homes (0677), BDW Trading (0350), CALA Management Ltd (0465), Dandara East Scotland (0757), Hallam Land Management (0457), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Landowner of East Foxhall (0544), Melford Developments Ltd (0308), Miller Homes (0256), Miller Homes Limited (0649), Mr T Klan (0307), Murray Estates (0197), Nicola McCowan Hill (0195), Persimmon Homes (0495), Robertson Residential (0490), Robertson Residential Group (0537), Rosebery Estate (Bankhead) (0618), SEEDCo (0198), Spire Healthcare Limited (0719), Steve Loomes (0767), Stewart Milne Homes (0118), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Taylor Wimpey East Scotland (0770), The Association for the Protection of Rural Scotland (0334), The Stoddart Family (0749), University of Edinburgh (0464), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Wright PDL (0078)

City Plan 2030 identifies the Housing Land Supply:

<b>Proposals</b>	<b>Total</b>	<b>Market</b>	<b>Affordable</b>
Strategic Sites	14,250	9,263	4,987
Brownfield Sites	10,798	7,019	3,779
Legacy Sites	18,801	13,168	5,633
Proposals Total	43,849	29,450	14,399
Other sites in current land Supply	12,838	29,450	14,399
Consents since 31/03/21	263	233	30
New applications pending determination	478	360	118
<b>Total Land Supply</b>	<b>57,428</b>	<b>39, 124</b>	<b>18,304</b>

A total land supply of 57,428 is identified. The housing land requirement is 44,293. The total land supply therefore provides a flexibility of 30%. A maximum of 20% is already applied to the housing supply target to calculate the housing land requirement. When compared with the housing supply target of 36,911 there is flexibility of 56%.

City Plan allocates more land than the requirement for market and affordable housing to allow affordable housing to be provided through the delivery of market housing. Existing allocations and new proposals provide a range of sites, which are effective or expected to become effective in the Plan period, more than sufficient to ensure that should some sites not come forward for development as expected there will be adequate land to meet the housing land requirement and maintain a five year effective supply.

Policy Hou 4 provides for circumstances where a shortfall in the maintenance of the 5-year housing land supply is identified. It is dealt with under Issue 21 Housing Land Supply Policy.

Para 30 of SPP 2014 (CD096) sets out requirements of development plans. For the reasons stated above it is considered that City Plan meets with these requirements. No modification proposed.

### **Displacement of businesses**

Barratt David Wilson Homes (0678), Barratt David Wilson Homes (0677), BDW Trading (0350), Dandara East Scotland (0757), Homes for Scotland (0404), Julie Robertson (0210), Murray Estates (0197), Nicola McCowan Hill (0195), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Taylor Wimpey (0200), The Stoddart Family (0749), Wright PDL (0078)

Brownfield sites allocated in City Plan are within the general urban area. They are not allocated as employment land within the current development plan. 64% of allocated brownfield sites have operational businesses. City Plan aims to deliver mixed use communities. Policy Econ 5 Employment Sites and Premises requires that redevelopment of employment sites of all sizes includes floorspace designed to provide for a range of business and commercial users. This will retain and include small business commercial units within mixed use developments. Displacement, relocation and the need for employment land are dealt with under Issue 3 Delivery of the Strategy. **No modification proposed.**

### **Deliverability of Sites**

Barratt David Wilson Homes (0678), Barratt David Wilson Homes (0677), BDW Trading (0350), CALA Management Ltd (0465), Dandara East Scotland (0757), Esk Property LLP (0726), Hallam Land Management (0457), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Landowner of East Foxhall (0544), Lord Dalmeny (0475), Mactaggart & Mickel Homes Ltd (0312), Melford Developments Ltd (0308), Miller Homes Limited (0649), Mr T Klan (0307), Murray Estates (0197), NatWest (0477), Nicola McCowan Hill (0195), Persimmon Homes (0495), Robertson Residential (0490), Robertson Residential Group (0537), Robertson The Stoddart Family (0749), Rosebery Estate (Bankhead) (0618), Scottish Property Federation (0144), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Stirling Developments Limited (0303), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Taylor Wimpey East Scotland (0770), The Catchelraw Trust (0137), University of Edinburgh (0464), Watkin Jones Group (0516), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Wright PDL (0078)

Allocated sites are considered to be deliverable in the period of the plan. The Council does not consider it necessary for a site to be promoted by a landowner to be identified as a suitable development opportunity. Whilst some sites may be technically constrained by PAN 2/2010 (CD118) definition of ownership, once allocated, this could change over the course of the plan. The Council will work with partners and landowners to bring sites forward throughout the Plan period. As referred to above there is evidence from the existing housing land supply of constrained sites where the identified constraint was ownership, which have come forward for development.

Scottish Government Guidance, Compulsory Purchase Orders and Acquiring Authorities: Guidance on CPO Use, 2018 (CD120) encourages authorities to consider using their CPO powers when necessary and appropriate. The Council acknowledges that, should it be necessary, it may have to use its compulsory purchase powers and this is referred to in the plan. This is addressed further in Issue 3 Delivery of the Strategy. The Plan does not rely on CPO to deliver the land supply.

Sites totalling 5,430 units are in public ownership. 3,262 are in full or partial Council ownership.

There is development activity (pre-app, EIA screening, PAN, application, consent) on sites which could provide 13,273 units. Almost half of the allocated units are in control of owners pursuing mixed use residential development.

Occupation of sites is not considered to be a barrier to development. Many of the industrial sites allocated are outdated properties that will ultimately become obsolete. The value of older real estate and the income in perpetuity will therefore inevitably fall as it becomes obsolete, either in terms of its stock or its location and owners will be faced with the choice of investing in the real estate to replace the buildings or by selling the site to developers. It is for this reason that there has been long term trend for the redevelopment of old employment sites. Residential land values have historically been higher, particularly compared to dated industrial stock, and as a result the Council does not consider the fact that sites have been in active employment use will intrinsically hinder the delivery of the housing.

Ryden Mixed Use Delivery Study 2020 (CD036) examines redevelopment of industrial buildings which have taken place. Residential use is the most common redevelopment. Particularly in the north east there are examples of redevelopment on sites similar to those identified in City Plan.

Many of the sites are within areas of which are already changing in nature toward residential and mixed use.

It is not accepted that the cost of developing brownfield land will be prohibitive in delivering housing. Development of windfall sites has been above the level anticipated in the Edinburgh Local Development Plan 2016 (CD042). The Plan anticipated a contribution of 4,650 units on windfall sites between 2015 and 2026. Up to 2021, there have already been 3,050 windfall completion with a further 4,120 programmed for completion up to 2026. This forward programme equates to 830 homes per year. In reality it is likely to be even higher as the programming only relates to windfall sites that already have consent – additional consents on windfall sites are likely over the next 5 years.

Developer contributions will be sought in line with Policy Inf 3 Infrastructure Delivery and Developer Contributions.

Further sites proposed in representations are dealt with under Issue 11 Suggested Greenfield Sites and Issue 12 Other Sites. **No modification proposed.**

### **Affordable Delivery**

Barratt David Wilson Homes (0678), BDW Trading (0350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), Scottish Property Federation

(0144), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), The Catchelraw Trust (0137), Stirling Developments Limited (0303)

There is a clear commitment and strategies in place to deliver affordable housing in Edinburgh. The Strategic Housing Investment Plan (SHIP) 2022-27 (CD057) sets out a pipeline of 11,188 affordable homes that could be approved for site start and 10,124 potential completions over the next five years through a mix of grant funding, registered social landlords own finance, finance raised by private developers, institutional investment, developer contributions and Housing Revenue Account (HRA) funding. In 2021/22 there were 1,251 new affordable homes approved for site start for social rent, mid-market rent and low-cost home ownership and a total of 1,041 homes completed. Over 10,000 affordable homes have been approved since 2015/16, with almost 8,000 affordable homes completed over the same period.

Grant funding limitations are acknowledged, and the SHIP (CD057) sets out other mechanisms to accelerate the delivery of affordable housing, including affordable homes delivered without grant subsidy. Funding requirements are updated to Scottish Government annually through the SHIP and these would include any additional grant funding required to deliver affordable housing. Edinburgh has benefitted from over £36m in additional Affordable Housing Supply Programme funding in recent years. **No modification proposed.**

Lord Dalmeny (0475)

Para 2.3 of the Plan sets out the aims. It is not necessary or appropriate to amend para 2.2 to clarify timescales and means to be used to secure delivery of brownfield sites. All sites are considered to be deliverable in the period of the plan. **No modification proposed.**

### **Programming**

Barratt David Wilson Homes (0678), Barratt David Wilson Homes (0677), BDW Trading (0350), CALA Management Ltd (0465), Dandara East Scotland (0757), Hallam Land Management (0457), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Landowner of East Foxhall (0544), Melford Developments Ltd (0308), Miller Homes Limited (0649), Mr T Klan (0307), Murray Estates (0197), Nicola McCowan Hill (0195), Persimmon Homes (0495), Robertson Residential (0490), Robertson Residential Group (0537), Rosebery Estate (Bankhead) (0618), Scottish Property Federation (0144), SEEDCo (0198), Steve Loomes (0767), Stewart Milne Homes (0118), Stoddart Family (0749), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Taylor Wimpey East Scotland (0770), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Wright PDL (0078)

Programming of existing land supply sites is set out in the Housing Land Audit and Completions Programme 2021 (HLACP) (CD055) and has been agreed with Homes for Scotland.

Each of the proposed sites has been assigned an estimated delivery programme. The programming has been carried out using the following methodology. Sites were first categorised according to the likely start date. Sites have been categorised as

- Early start: first completions 2023 to 2025
- Mid start: first completions 2026 to 2027
- Late start: first completions 2028 to 2030

Each site has been considered separately according to the following factors:

- Planning Status – any current or previous planning application to develop the site
  - Site with planning applications/consents will generally be categorised as ‘Early start’
- Current use of site - number and type of businesses operating
  - Vacant sites will generally be categorised as ‘Early start’
  - Sites with single or few occupiers will generally be categorised as ‘Mid start’.
  - Sites with multiple businesses operating will be categorised as ‘Late start’
- Size and location of site
  - Larger sites requiring new infrastructure will have a later start than smaller or infill sites
- Ownership – council, other public or private. Indication of landowner’s intention
  - Public Sites, particularly council owned sites will generally be considered for earlier start than privately owned sites with the landowner’s intention is not known
- Known developer interest
  - Site with known developer interest will generally be considered for earlier start where interest to develop is unknown.
- Responses to proposed plan

Once the estimated start date has been made, the annual rate of development is determined, based upon evidence from previous housing land audits. Consideration is given to size and density of site.

All allocations are considered to be deliverable within the Plan period. Notional programming is set out in Appendix 1 to this schedule (CD176). **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309), Spire Healthcare Limited (0719)

Draft NPF4 (CD099) sets out that plans should have a focus on the delivery of housing at all stages of the Plan making process and beyond into the delivery role of the plan. The Council’s annual Housing Land Audit and Completions Programme (HLACP) (CD055) is consulted upon with the development industry through the representative body, Homes for Scotland. As well as agreeing the likely forward programme of completions on each site, the sites are also assessed against a range of factors affecting delivery. Each site is classified as to what action, if any, would be required to increase completion rates. This allows the council and partners to focus upon increasing or accelerating delivery on land



where and when it is needed. This is considered to be in the spirit of drat NPF4 (CD099). **No modification proposed.**

## Range of sites

Barratt David Wilson Homes (0678), Barratt David Wilson Homes (0677), BDW Trading (0350), CALA Management Ltd (0465), Dandara East Scotland (0757), Esk Property LLP (0726), Hallam Land Management (0457), Hallam Land Management (0599), Hallam Land Management (0615), Homes for Scotland (0404), Inverdunning (Hatton Mains) Ltd (0427), Landowner of East Foxhall (0544), Lord Dalmeny (0475), Melford Developments Ltd (0308), Miller Homes Limited (0649), Mr T Klan (0307), Murray Estates (0197), Persimmon Homes (0495), Nicola McCowan Hill (0195), Robertson Residential (0490), Robertson Residential Group (0537), Rosebery Estate (Bankhead) (0618), SEEDCo (0198), Spire Healthcare Limited (0719), Steve Loomes (0767), Stewart Milne Homes (0118), Stirling Developments Limited (0303), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Taylor Wimpey East Scotland (0770), The Catchelraw Trust (0137), The Stoddart Family (0749), West Craigs Limited & Dunedin Canmore Housing Association (Wheatley Group) (0352), Wright PDL (0078)

The overall land supply provides flexibility, with a range of sites. The allocations in the Plan range in scale from 8 units to 7,000, 40% is greenfield and 60% brownfield.

## Breakdown of proposals

	Sites >50	Sites<50	Greenfield	Brownfield
All	42,783	970	17,534	26,219
Strategic	14,250	0	9,750	4,500
Brownfield	9,732	970	0	10,702
Legacy	18,801	0	7,784	11,017

It is considered that the Plan provides a generous supply of housing land on a range of sites across the city and it is not necessary to allocate further sites. Spatial strategy is addressed in Issue 2 Spatial Strategy. **No modification proposed.**

## General

### Archie Clark (0003)

Paragraph 2.106 of the Plan explains the components of the housing land supply set out in the accompanying table, which refers to legacy sites. It explains that the existing land supply identified in the Housing Land Audit and Completions Programme 2021 (CD055) provides a starting point to meet the calculated requirement and that this includes allocations carried over from the Edinburgh Local Development Plan 2016 (CD042). These are identified as legacy sites in the accompanying table. **No modification proposed.**

### Esk Property LLP (0726), Spire Healthcare Limited (0719)

The release of greenbelt is not necessary for the reasons given above. Allocations provide a range of sites both greenfield and brownfield. Policy Hou 1 supports housing

development on these sites and this could include housing to meet specialist needs. There is no basis on which to allocate sites for specialist housing. This is dealt with under Issue 19: Housing Supply Target and Land Requirements. The planning application process allows for material considerations, including viability, to be considered on a case-by-case basis. **No modification proposed.**

Mark Ockendon (0419)

New allocations have been made in line with the spatial strategy which directs new development to brownfield land. Place policies and Development Principles are set out in the Plan to guide development of individual sites recognising their individual characteristics. City Plan policies Env 9 – Env 13 provide policy to protect historic area. **No modification proposed.**

BDW Trading (0350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Housing delivery is considered to be realistic therefore there is no need to replace table on p. 29 entitled 'Housing Land Supply' or to make consequential changes to the spatial strategy. **No modification proposed.**

Hallam Land Management (0457), Robertson Residential Group (0537)

There is no need to revise paragraphs 2.104 – 2.110 and the associated City Plan housing land requirement table (page 28) and housing land supply table (page 29). The strategy provides for greenfield alongside brownfield and it is considered that the land supply is sufficient. **No modification proposed.**

There is no need to amend paragraph 2.88 to refer to additional greenfield land. The allocations provide a range of brownfield and greenfield land. **No modification proposed.**

Hallam Land Management (0457), Inverdunning (Hatton Mains) Ltd (0427) Robertson Residential Group (0537)

There is no need to amend aim 2. The land supply provide a range of sites and it is not necessary to allocate additional greenfield land. Spatial strategy is dealt with under Issue 2 Spatial Strategy. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

There is no need to amend the housing land supply calculation. As set out above the calculation is considered to be appropriate. Individual housing proposals are considered under Issue 4-8 Proposed Sites. **No modification proposed.**

There is no need to amend paragraphs 2.110, 2.112 or 2.88 as the land supply is considered to be sufficient and a range of sites provided. It is not necessary to release additional greenfield land. **No modification proposed.**

There is no need to add to paragraph 2.100 as this paragraph relates to the setting of target and not allocations. **No modification proposed.**

It is accepted that plan identifies significant proposals in South East Edinburgh however it is not considered necessary to refer specifically to the delivery of new communities in south east Edinburgh as the aim includes "on other major development sites across the city" **No modification proposed.**

Spire Healthcare Limited (0719)

Change to aim 2 to include reference to support for greenfield sites is not accepted for the reasons given above. The mix of dwelling sizes and tenure types including for homes for older people are dealt with under Issue 26: Housing Policies. It is not appropriate to refer to policy within this aim. **No modification proposed.**

There is no need to amend paragraphs 2.104 to 2.110 or the City Plan housing land requirement table (page 28) and housing land supply table (page 29) or outcomes on page 26. The spatial strategy is considered to be appropriate and provide sufficient land to meet the housing land requirement on a range of sites. It is not necessary to allocate additional greenfield land. Spatial Strategy is dealt with under Issue 2 Spatial Strategy **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 20: Assessment of Housing Land Supply

Appendix 1 Programming

										Programme												
Site Ref	Site Name	Capacity	Sector	Developer Interest	Development Activity	Use - Broad	In Business Use	Planning History	Phasing - site start	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	
H1	Dundee Street	45	Private	No	No	Retail - small	Yes	No planning history	Mid					20	25							
H2	Dundee Terrace	45	Private	No	No	Retail - small	Yes	No planning history	Mid					20	25							
H3	Chalmers Street (Eye Pavilion)	68	Public	No	No	Healthcare	Yes	New application for air system on roof	Late								30	38				
H4	Dalry Road	45	Private	No	No	Vacant	No	No planning history	Early				20	25								
H5	Roseburn Street	152	Public	No	No	Retail - multi	Yes	No planning history	Late							50	50	52				
H6	Russell Road (Royal Mail)	69	Private	No	No	Office	Yes	No planning history	Late											69		
H7	Murieston Lane	69	Private	No	No	Retail/commercial	Partial	No planning history	Mid					30	39							
H8	Astley Ainslie Hospital	500	Public	Yes	No	Health	Yes	No relevant planning history	Late						50	50	100	100	100	100		
H9	Falcon Road West	11	Private	No	No	Office	Yes	In HLA	Early		11											
H10	Watertoun Road	72	Public	Yes	Notice of intention	Other public land and buildings	No	21/03813/FUL PDE - Cala homes	Mid					36	36							
H11	Watson Crescent Lane	8	Private	No	No	Storage	Yes	No planning history	Mid					8								
H12	Temple Park Crescent	46	Private	Yes	Consent - site cleared	Retail - small	No	21/02715/FUL: Granted for 46 dwellings	Early		14	14										
H13	Gillespie Crescent	166	Private	No	No	Housing	No	No planning history	Late								50	50	66			
H14	Ratcliffe Terrace	97	Private	No	No	Retail - Small	Yes	No planning history	Late								47	50				
H15	St Leonard's Street (car park)	24	Public	No	No	Car Park	No	No planning history	Mid						24							
H16	Eyre Terrace	279	Private	Yes	Consent - preparation underway	Office	No	20/03034/FUL - Granted. 20/03034/VARY2 also granted - total units is 349	Early			50	100	100	29							
H17	Eyre Place	9	Private	Yes	Application - site cleared	Cleared Site	No	2 applications for student accommodation (22/03834/FUL) and 9 townhouses (22/03833/FUL)	Early			9										
H18	Royston Terrace	28	Private	No	No	Retail - Small	Yes	No planning history	Mid					28								
H19	Broughton Road	262	Public	Yes	PAN / EIA Screening	Vacant	No	PAN Submitted (22/02348/PAN) - CEC	Mid					23								
H20	Broughton Market	41	Private	No	No	Workshops	Yes	No planning history	Late							21	20					
H21	East London Street	41	Private	No	No	Retail - small	Yes	No planning history	Mid					20	21						23	
H22	McDonald Road (B)	158	Private	No	No	Office	Yes	No planning history	Late								50	50	58			
H23	McDonald Place	152	Private	No	No	Retail - Small	Yes	Part of site previously had consent for 11 units - 16/03471/FUL	Mid						30	50	72					
H24	Norton Park	69	Private	No	No	Retail - Multi	Yes	No planning history	Late								30	39				
H25	London Road (B)	113	Private	No	No	Retail - small	Yes	No planning history	Mid						50	63						

Site Ref	Site Name	Capacity	Sector	Developer Interest	Development Activity	Use - Broad	In Business Use	Planning History	Phasing - site start	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	
H26	Portobello Road	41	Private	No	No	Retail - small	Yes	No planning history	Mid					21	20							
H27	Willowbrae Road	24	Private	Yes	No	Vacant	No	App for student accomodation refused 17/01565/FUL	Early				24									
H28	Cowans Close	55	Public	Yes	Application	Storage	No	21/06745/FUL (CEC) 19 units	Early			25	30									
H29	Silverlea	120	Public	Yes	Consent	Health Care	No	21/05056/FUL PDE - Cruden for CEC (146) approved at LRB	Early			20	50	50								
H30	Ferry Road	14	Private	No	No	Retail - small	Yes	19/04477/FUL - change to include vehicle repair.	Mid					14								
H31	Royal Victoria Hospital	360	Public	Yes	No	Health	No	PAN submitted in 2014	Late							50	100	100	110			
H32	Crewe Road South	320	Public	No	No	Other Public Land and Buildings	Yes	No planning	Mid					50	50	75	75	70				
H33	Orchard Brae Avenue	55	Private	Yes	PAN / EIA Screening	Vacant Office	No	20/03938/PAN : 22/01570/EIA	Early				25	30								
H34	Orchard Brae	124	Private	Yes	Consent (MTG)	Vacant Office	No	21/06512/FUL	Early			24	50	50								
H35	Salamander Place	113	Private	No	No	Scrap yard	Yes	No planning history	Mid						30	50	33					
H36	North Fort Street	8	Private	No	No	Vacant	No	No planning history	Mid					8								
H37	Coburg Street	152	Public	No	No	Industrial Estate	Yes	Application in 2019 for some minor changes to building	Late								52	50	50			
H38	Commercial Street	45	Private	No	No	Retail - small	Yes	No planning history	Late							45						
H39	Pitt Street	48	Private	Yes	Application	Workshops	Yes	21/05861/FUL - PCO (103 dwellings) - part site only	Early			48										
H40	Steads Place	193	Private	Yes	Consent - work underway	Retail/Storage - vacant	No	20/05553/FUL - consent granted for 148 flats + shops/business	Early		20	50	60	63								
H41	Jane Street	448	Public	No	No	Industrial Estate	Yes	No planning hitosry	Late								48	100	100	100	100	
H42	Leith Walk /Manderston Street	235	Public	Yes	Application	Vacant	No	19/00415/PAN: 22/01563/FUL pending	Mid					50	50	100	35					
H43	West Bowling Green Street	83	Public	No	No	Retail	Yes	No planning history	Late									40	43			
H44	Newhaven Road 1	90	Private	No	No	Storage	Yes	No planning history	Mid						30	30	30					
H45	Newhaven Road 2	193	Private	Yes	No	Industrial Estate	Yes	19/05092/FUL - part of site. Full consent for 58 dwellings	Late								30	60	103			
H46	Bangor Road	290	Private	No	No	Industrial Estate	Yes	App for new dance studio	Late								50	100	100	40		
H47	South Fort Street	414	Private	No	No	Industrial Estate	Yes	No planning history	Late								50	100	100	100		
H48	Stewartfield	207	Private	No	No	Industrial Estate	Yes	No planning history	Late								50	100	57			
H49	Corruna Place	24	Private	No	No	Industrial Estate	Yes	No planning histroy	Late								24					
H50	Bonnington Road	56	Private	No	No	Retail	Yes	Consent for change from Class 1 to class/class 6	Late									26	30			
H51	Broughton Road	23	Private	No	No	Storage	No	No planning history	Mid					50	50	75	75	12				
H52	Iona Street	80	Private	Yes	Under Construction	UC	No	20/00972/FUL - granted for student housing and 80 flats	Early		20	60										
H53	Albert Street	28	Private	No	No	Retail	Yes	No planning history	Mid					28								
H54	St Clair Street	373	Public	No	No	Retail	Yes	No relevant planning history	Late								50	100	100	123		

Site Ref	Site Name	Capacity	Sector	Developer Interest	Development Activity	Use - Broad	In Business Use	Planning History	Phasing - site start	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	
H55	Seafield	800	Private	Yes	Applications	Various	Yes	Planning application for 220 units on part of site (22/00733/PPP)	Mid					50	100	100	100	200	250			
H56	Sir Harry Lauder Road	104	Private	No	No	Retail - small	Yes	No planning history	Mid					50	54							
H57	Joppa Road	8	Private	No	No	Retail - small	Yes	No planning history	Mid					8								
H58	Eastfield	40	Private	No	No	Retail - small	Yes	No planning history	Mid					40								
H64	Land at Ferrymuir	88	Private	No	No	Offices	Yes		Late							44	44					
H65	Old Liston Road	104	Private	No	No	Vacant	No	01/04594/OUT - lapsed consent for housing	Mid					50	54							
H66	St John's Road (A)	14	Private	No	No	Retail - small	Yes	No planning history	Mid					14								
H67	St John's Road (B)	72	Private	No	No	Industrial Estate	Yes	No planning history	Late									32	40			
H68	Kirk Loan	16	Public	Yes	No	Other Public Land and Buildings	No	No planning history	Late											16		
H69	Corstorphine Road (A)	16	Private	No	No	Retail - small	Yes	No planning history	Mid					16								
H70	Corstorphine Road (B)	8	Private	No	No	Retail - small	Yes	18/09094/FUL consent for car wash	Mid					8								
H71	Gorgie Park Close	110	Private	No	No	Office	Yes	No planning history	Late									50	60			
H72	West Gorgie Park	110	Public	No	No	Industrial Estate	Yes	No planning history	Late									50	60			
H73	Gorgie Road (Caledonian Packaging)	138	Private	Yes	No	Industrial Estate	Yes	21/02824/FUL Granted for 8 units (smallpart of site). Preapp in 2013 for residential development	Late								38	50	50			
H74	Craiglockhart Avenue	24	Private	No	No	Vacant	No	No planning history	Early				24									
H75	Lanark Road	80	Private	No	No	Vacant	No	No planning history	Early				40	40								
H76	Peatville Gardens	10	Private	Yes	MTG	Retail - small	Yes	18/04268/FUL - MTG	Early			10										
H77	Gorgie Road (East)	469	Private	No	No	Vacant	No	21/01775/FUL - consent CoU to car sales (part of site). 21/01523/FUL - granted for CoU to storage	Early				50	50	100	100	100	69				
H78	Stevenson Road	290	Private	No	No	Retail - multi	Yes	Recent student housing adjacent	Late								50	100	100	40		
H79	Broomhouse Terrace	320	Public	No	No	Office	No	No planning history	Mid					50	100	100	70					
H80	Murrayburn Road	384	Public	Yes	No	Industrial Estate	Yes	No planning history	Mid						50	50	100	100	84			
H81	Dumbryden Drive	124	Public	Yes	No	Industrial Estate	Yes	No planning history	Late							24	50	50				
H82	Murrayburn Gate	135	Public	Yes	Application	Vacant	No	Application for 73 affordable units (22/03302/FUL).	Early				35	50	50							
H83	Clovenstone House	97	Public	Yes	No	Health Care	Yes	No planning history	Early			47	50									
H84	Calder Estate	28	Public	No	No	Car park	Yes	No planning history	Mid					28								
H85	Redford Barracks	800	Public	Yes	No	Other Public Land and Buildings	Yes	No planning history	Late									100	200	200	200	100
H87	Duddingston Park South	24	Private	No	No	Car Park	Yes	No planning history	Mid						24							
H88	Moreudun Park Loan	32	Private	No	No	Car Park	No	No planning history	Late								32					

Site Ref	Site Name	Capacity	Sector	Developer Interest	Development Activity	Use - Broad	In Business Use	Planning History	Phasing - site start	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	
H89	Moredun Park View	24	Public	No	No	Other Public Land and Buildings	No	No planning history	Mid					24								
H90	Morrisons at Gilmerton Road	32	Private	No	No	Car Park	No	No Planning history	Late								32					
H91	Liberton Hospital	120	Public	Yes	No	Health	No	EIA screening in 2020	Mid					60	60							
H92	Gilmerton Dykes Street	24	Public	Yes	No	Vacant	No	No planning history	Early			24										
H93	Rae's Crescent	32	Private	Yes	No	Car Park	No	08/03776/FUL - withdrawn - offices and flats	Mid						32							
H94	Old Dalkeith Road	24	Public	No	No	Retail - small	Yes	No planning history	Mid						24							
H95	Peffermill Road	16	Private	No	No	Retail - small	Yes	21/01853/FUL - recent consent to extend dealership	Mid						16							
H59	Land at Turnhouse Road (SAICA)	1000	Private	Yes	Preapp/EIA screening	Strategic	N/A	Preapp discussion / EIA screening	Mid					100	100	200	200	200	200			
H60	Turnhouse Road	200	Private	Yes	No	Strategic	N/A		Mid					50	50	50	50					
H61	Crosswinds	2500	Private	Yes	Application / Appeal	Strategic	N/A	20/03219/PPP appealed against non determination	Mid					100	200	300	300	300	300	300		
H62	Land adj to Edinburgh Gateway	250	Private	Yes	PAN	Strategic	N/A	21/01364/PAN submitted	Mid					50	50	75	75					
H63	Edinburgh 205	7000	Private	Yes	PAN / Preapp	Strategic	N/A	PAN submitted 22/01655/PAN. Preap	Mid					100	200	200	500	500	500	500	500	
H86	Edinburgh Bioquarter	2500	Private		No	Strategic	N/A		Late							200	300	300	500	500	500	200
<b>Total</b>										<b>0</b>	<b>65</b>	<b>381</b>	<b>558</b>	<b>1662</b>	<b>1823</b>	<b>2102</b>	<b>3192</b>	<b>3338</b>	<b>3361</b>	<b>2088</b>	<b>1323</b>	<b>300</b>

Issue 21	Housing Land Supply Policy	
Development plan reference:	Part 3: Policies - page 122, Policy Hou 4 Housing Land Supply	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Alexander Sutherland (0193)</div><div>Archie Clark (0003)</div><div>Barratt David Wilson Homes (0677)</div><div>BDW Trading (0350)</div><div>CALA Management Ltd (0465)</div><div>Dandara East Scotland (0757)</div><div>Dunedin Canmore Housing Limited (0766)</div><div>Hallam Land Management (0457)</div><div>Hallam Land Management (0599)</div><div>Hallam Land Management (0615)</div><div>Homes for Scotland (0404)</div><div>Landowner of East Foxhall (0544)</div><div>Miller Homes Limited (0649)</div><div>Mr T Klan (0307)</div><div>Pawel Stankiewicz (0445)</div></div><div><div>Robertson Residential Group (0537)</div><div>Steve Loomes (0767)</div><div>Stewart Milne Homes (0118)</div><div>Stirling Developments Limited (0303)</div><div>Tarmac (0244)</div><div>Taylor Wimpey (0200)</div><div>Taylor Wimpey and Hallam Land Management Ltd (0603)</div><div>The Association for the Protection of Rural Scotland (0334)</div><div>Wright PDL (0078)</div></div></div>		
Provision of the development plan to which the issue relates:	Policy to apply where a shortfall in the maintenance of the 5-year housing land supply is identified.	
Planning authority's summary of the representation(s):		
<div><div><div>Alexander Sutherland (0193)</div><div>Suggests removal of the opening paragraph option of Hou 4 to accept proposals in countryside or green belt.</div><div>There should not be a get-out clause that circumvents the aim of "Directing new development to, and maximising the use of, brownfield land rather than greenfield land."</div></div><div><div>Archie Clark (0003)</div><div>Greenfield development must be prevented. Consider that the statement in the policy "Where a shortfall in the maintenance of the 5-year housing land supply is identified ... proposals within the countryside or green belt area will only be permitted where..." will be used by developers to promote their green belt/green field proposals. Suggests alternative as "Proposals for development in the green belt and Countryside will not be considered unless they are for a short-term (5 years) or of a reversible nature to ensure that prime quality agricultural land, or land of lesser quality that is locally important retains its capacity for food production in support of national goals for food security. Proposals will only be permitted in the countryside where they are a brownfield development or on land that is of LCA Class 4.1 or a higher number. These must take account of principle C in Scottish Land Use Strategy ('Getting the best from our land') which states: "Where land is</div></div></div>		



highly suitable for a primary use (for example food production, flood management, water catchment management and carbon storage) this value should be recognised in decision-making.”

Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

Parts (a) and (b) make any additional housing sites in these locations highly questionable given the highly restrictive proposed policies on development in the green belt or countryside. Therefore, if the 5-year housing land supply is not being met, the ability for the new build sector to identify any further sites to plug the gap in delivery is extremely challenging. Concern that the Council’s unwillingness to allocate a suitable range and volume of land will exacerbate existing affordability issues. What happens within Edinburgh has significant consequences for other areas and urge the Council to seriously reconsider their current strategy.

Suggested that this policy be amended to better reflect and align with SESplan Policy 7, and to move towards a more achievable bar for development proposals to meet once a shortfall is established.

BDW Trading (0350), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Submit a supporting document - Housing Land Supply Assessment, December 2021.

Hou 4 (a) should be amended to avoid harm to the character of the settlement and local area rather than requiring it to be reflected.

Hou 4 (b) should be removed. A decision maker must be able to weigh any impacts on the objectives of the green belt against potential benefits of the proposal and reach a decision. Any negative impact on the green belt will not always outweigh positive impacts of development including meeting market housing demand and affordable need in a city with restricted housing supply.

In *Gladman v Scottish Ministers* ([2020] CSIH 28) the Opinion of the Court of Session explained the following in relation to a shortfall in housing land supply

“The greater the shortage, the heavier the weight which tilts the balance will be. If the appellants’ figures for the shortage are correct, that weight may well be very substantial.” (para. 50)

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Submit a supporting document - Development Strategy Statement - City Plan 2030. In accord with SPP (paragraph 110 and 119), SESplan Policy 7 and the Housing Land Technical Note (May 2014), the Council is required to achieve the housing land requirement by 2032. Accordingly, the purpose of Policy Hou 4 is to achieve the housing land requirement through a monitoring exercise maintaining a five year effective housing land supply at all times. This takes account of housing completions to date over the Plan period. The wording related to infrastructure provision is not in accord with SESplan (2013) and requires amendment.

Dunedin Canmore Housing Limited (0766)

Considers that there needs to be a greater focus on deliverability to ensure that housing needs are met within the City Plan 2030, particularly affordable housing provision. Many of the identified brownfield housing land opportunities are currently in active alternative use and with no immediate prospect of conversion to housing. To ensure deliverability, and to meet the expected housing requirements throughout the lifetime of the plan, there needs to be allowances for others site to come forward.

Hallam Land Management (0615), Mr T Klan (0307), Tarmac (0244)

The restrictions imposed through Hou 4, together with other restrictions in policies such as Env 18, will make it nigh on impossible for a developer to present an unobjectionable proposal to the decision makers.

The Plan either needs to allocate acceptable greenfield housing sites or relax the policy restrictions to ensure greenfield sites have a legitimate chance of gaining consent.

Hallam Land Management (0457), Robertson Residential Group (0537)

Consider Policy Hou 4 contrary to the aims of Hou 3 Mixed Communities and therefore Policy Hou 4 should be amended so as not to impose a blanket requirement for 65 dwellings per hectare.

Policy Hou 4 should be amended to reflect realistic tests, which ensure that the delivery of greenfield land is not significantly constrained by such restrictive policy. Hou 4 (a) and Hou 4 (b) make any development within the green belt or countryside significantly challenging given the restrictive policies contained within the Plan regarding green belt and countryside. Policy will therefore severely inhibit greenfield sites coming forward for development, due to the difficulty the private sector would face in identifying suitable sites to meet this policy, further exacerbating housing land shortfalls and ultimately undermining the outcomes of City Plan 2030, including 'A city in which everyone lives in a home which they can afford'.

Re-worded to read:

'Where a shortfall in the maintenance of the 5-year housing land supply is identified (as evidenced through the housing land audit) proposals within the countryside or green belt area will be supported by the Council where it is demonstrated that the proposal:

- a) is effective or capable of becoming effective in the relevant timeframe,
- b) provides requisite infrastructure capacity to absorb the additional impact of the development or demonstrates that infrastructure is already available or can be delivered at the appropriate time,
- c) is sustainable development, and
- d) is compatible with other policies of the plan.'

Landowner of East Foxhall (0544)

Objects to the wording of policy on the basis that it is not specific in regard to the age of the Housing land Audit, nor how it has been agreed. Request that a change is made to this policy to state that the shortfall must be identified in an "up to date, annual housing land audit", which has been agreed by the industry, or Homes for Scotland.

Pawel Stankiewicz (0445)

Remove Hou 4 (a) and Hou 4 (b) as Edinburgh during its history changed its character constantly, so it should not be avoided in the future and green belt objective is to block new housing in its area.

Stirling Developments Limited (0303)

Support policy Hou 4, but note there needs to be an ongoing, independent, rigorous review of the housing land supply throughout the Plan period.

Taylor Wimpey and Hallam Land Management Ltd (0603)

Refer to Court of Session in the case of Gladman Developments Ltd v Scottish Ministers [2020] CSIH 28 which considered how paragraph 33 of SPP should be interpreted and whether a housing proposal needed to contribute to sustainable development or comply with all of the sustainability criteria in paragraph 29 of SPP.

At paragraph 46 of the Courts judgment, it states a housing development which will remedy, to some extent, a housing shortage is something which almost inevitably contributes to sustainable development, which is what paragraph 33 requires, in one degree or another. It will do so also in terms of the economic benefits of construction and in other ways too. Whether it is, in overall terms, a sustainable development is another question. That is one for planning judgment, but it involves the use of the tilted balance.

On this basis, Hou 4 (b) should be removed. A decision maker must be able to weigh any impacts on the objectives of the green belt against potential benefits of the proposal and reach a decision. Any negative impact on the green belt will not always outweigh positive impacts of development including meeting market housing demand and affordable need in a city with restricted housing supply.

Hou 4 (c) states that proposals would only be acceptable if a site is sustainable development, however, it is not clear how this criterion would be applied. Whether a development is, in overall terms, a sustainable development is one for the planning balance. If the Council's definition is to comply with all the sustainability criteria in paragraph 29 of SPP then this policy would not be lawful. Furthermore, there is a policy in SESplan (Policy 7) which provides the decision maker with criteria to consider where there is a shortfall in the housing land supply. Policy 7 of SESplan does not include this criterion. Question whether it is necessary to include this policy in the LDP and why it diverges from the criteria in Policy 7 of SESplan. Therefore, submit that Hou 4 (b) and Hou 4 (c) are deleted.

The Association for the Protection of Rural Scotland (0334)

Hope policy on land supply will become obsolete in light of indications from Scottish Government. Agree that the Housing land supply policy should not be used to force approval for development which is incompatible with the aims and policies of the Plan and the Council's Climate Strategy. In particular the presumption against development in the Green Belt and countryside should be upheld in the face of the climate emergency and nature crisis.

Agree that "Any shortfall in housing land supply, whilst carrying weight, does not necessarily over-ride other considerations such as directing development to sustainable locations, securing green belt objectives and the appropriate provision of supporting infrastructure." Otherwise, the plan-led system of development control and management is undermined and early engagement of residents in planning becomes less worthwhile.

**Modifications sought by those submitting representations:**

Alexander Sutherland (0193)

Remove opening paragraph to accept proposals in countryside or green belt.

Archie Clark (0003)

Change to "Proposals for development in the green belt and Countryside will not be considered unless they are for a short-term (5 years) or of a reversible nature to ensure that prime quality agricultural land, or land of lesser quality that is locally important retains its capacity for food production in support of national goals for food security. Proposals will only be permitted in the countryside where they are a brownfield development or on land that is of LCA Class 4.1 or a higher number. These must take account of principle C in Scottish Land Use Strategy ('Getting the best from our land') which states: "Where land is highly suitable for a primary use (for example food production, flood management, water catchment management and carbon storage) this value should be recognised in decision-making."

Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

Suggest that policy be amended to better reflect and align with SESplan Policy 7, and to move towards a more achievable bar for development proposals to meet once a shortfall is established.

BDW Trading (0350), Stewart Milne Homes (0118), Taylor Wimpey (0200).

Amend Hou 4 (a) to "Would not have a harmful impact on the character of the settlement and local area"

Remove Hou 4 (b).

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Amend Hou 4 to:

"The council is required to maintain a least a 5 year effective housing land supply at all times throughout the lifetime of the Plan to achieve the housing land requirement. An annual audit of the housing land supply (agreed with housing providers) will monitor and review the housing land supply in accordance with SPP and the Strategic Development Plan.

Where it is demonstrated that a least a 5 year effective housing land supply is not maintained at all times over the Plan period to achieve the housing land requirement,

proposals within the countryside or green belt area may be granted planning permission where:

- a. the development is in keeping with the character of the settlement and local area,
- b. the development will not undermine green belt objectives,
- c. the development contributes to sustainable development as set out in SPP 2014,
- d. the development is effective or capable of becoming effective within a five year period,
- e. any additional infrastructure required as a result of the development is either committed or to be funded by the developer, and,
- f. is compatible with other policies of the plan.”

Dunedin Canmore Housing Limited (0766)

No change suggested.

Hallam Land Management (0615), T Mr T Klan (0307), Tarmac (0244).

Alter first sentence in policy to say ‘...evidenced through an up to date and agreed housing land audit)....’

Remove ‘in the relevant timeframe’ and replace with ‘within 5 years’ from clause Hou 4 (d).

As a concluding policy statement under clause (f) state ...’ Proposals that do not accord with the development plan will not be considered acceptable unless material considerations indicate otherwise’.

Hallam Land Management (0457), Robertson Residential Group (0537)

Re-word Policy Hou 4 to:

‘Where a shortfall in the maintenance of the 5-year housing land supply is identified (as evidenced through the housing land audit) proposals within the countryside or green belt area will be supported by the Council where it is demonstrated that the proposal:

- a) is effective or capable of becoming effective in the relevant timeframe,
- b) provides requisite infrastructure capacity to absorb the additional impact of the development or demonstrates that infrastructure is already available or can be delivered at the appropriate time,
- c) is sustainable development, and
- d) is compatible with other policies of the plan.’

Landowner of East Foxhall (0544)

Change wording of policy to reflect Planning Advice Note 2/2010 that Housing Land Audits should be undertaken on an annual basis. The Housing Land Audit should be consulted on and agreed by the housing industry.

Pawel Stankiewicz (0445)

Remove Hou 4 (a)

Remove Hou 4 (b)

Stirling Developments Limited (0303)

No modification specified.

Taylor Wimpey and Hallam Land Management Ltd (0603)

Response suggests removal of policy

Remove Hou 4 (b)

Remove Hou 4 (c).

The Association for the Protection of Rural Scotland (0334)

No modification specified.

**Summary of responses (including reasons) by planning authority:**

Alexander Sutherland (0193)

The aim of the Plan is to deliver mixed use sustainable communities on the allocated land supply set out in Part 4, Table 2 and other suitable sites within the urban area. SPP 2014 (CD096) requires that a 5-years' supply of effective housing land is always maintained. A generous land supply is identified on page 29 of the Plan which should ensure that there is more than sufficient effective land to avoid the need for release of countryside or green belt land. SDP Policy 7 (CD087) allows housing development on greenfield land, subject to a number of criteria, where this is required to maintain the 5-years' effective housing land supply. Policy Hou 4 in the Plan sets the policy for Edinburgh and is consistent with SDP Policy 7. **No modification proposed.**

Archie Clark (0003)

The aim of the Plan is to deliver mixed use sustainable communities on the allocated land supply set out in Part 4, Table 2 and other suitable sites within the urban area. SPP 2014 (CD096) requires that a 5-year supply of effective housing land is always maintained. A generous land supply is identified on page 29 of the Plan which should ensure that there is more than sufficient effective land to avoid the need for release of countryside or green belt land. SDP Policy 7 (CD087) allows housing development on greenfield land, subject to a number of criteria, where this is required to maintain the 5-years' effective housing land supply. Policy Hou 4 in the Plan sets the policy for Edinburgh and is consistent with SDP Policy 7(CD087). The purpose of the policy is to allow for development in countryside or green belt locations to maintain a 5-year effective land supply. The suggestion that development in these areas is limited to short term uses would not meet with the objective of the policy. The value and use of land is a consideration within the assessment against Policy Hou 4 (c). **No modification proposed.**

Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

The aim of the Plan is to deliver mixed use sustainable communities on the allocated land supply set out in Part 4, Table 2 and other suitable sites within the urban area. A generous land supply is identified on page 29 of the Plan which should ensure that there is more than sufficient effective land to avoid the need for release of countryside or green

belt land. The amount and range of land is sufficient and is covered in Issue 20 Assessment of Housing Land Supply. Spatial strategy is covered under issue 2 Spatial Strategy.

Policy Hou 4 sets the policy for Edinburgh and is consistent with SDP Policy 7 (CD087). SDP Policy 7 allows housing development on greenfield land, to maintain the 5-years effective housing land supply, subject to the following criteria (a) the development will be in keeping with the character of the settlement and local area, (b) the development will not undermine green belt objectives, and (c) any additional infrastructure required as a result of the development is either committed or to be funded by the developer. Policy Hou 4 interprets this for Edinburgh. It reflects Part 2 of Policy Hou 1 in the adopted Edinburgh Local Development Plan, November 2016 (CD042). The adopted LDP Policy Part 2 of Hou 1 was included following the Examination of the Plan (CD158). In addition to the criteria set out in SDP Policy 7 the Reporter recommended that an additional criterion on sustainability be included to reflect the objectives of SPP 2014 (CD096).

SPP 2014 (CD096) sets out a presumption in favour of development that contributes to sustainable development. Policy Hou 4 (c) requires that proposals are sustainable development. The policy therefore goes further than SPP 2014 by requiring that development does not just contribute to sustainable development but is itself sustainable development. Sustainable development is defined in the Glossary of the Plan as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.' This is the definition provided in SPP 2014.

**No modification proposed.**

BDW Trading (0350), Stewart Milne Homes (0118), Taylor Wimpey (0200)

Policy Hou 4 (a) requires that proposals are in keeping with the character of the settlement and local area. This reflects the wording of SDP Policy 7. It is in line with proposed plan Policy Env 1 Design Quality and Context and Env 4 Development Design – Impact on Setting, which encourage design which draws upon positive characteristics of the surrounding area and where it will have a positive impact on its surroundings including the quality and character of the wider townscape. There is no justification to change the text as proposed. **No modification proposed.**

The change suggested is to remove Policy Hou 4 (b). Policy Hou 4 (b) requires that proposals will not undermine green belt objectives. This reflects SDP Policy 7 (CD087). Edinburgh's green belt plays an important role in directing the planned growth of the city, protecting and enhancing the quality, character, landscape setting and identity of the city and neighbouring towns, protecting and giving access to open space within and around the city and neighbouring towns. Hou 4 (b) is required to ensure that the Edinburgh Green Belt continues to meet its objectives while accommodating growth requirements. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The meaning of the suggested replacement policy text is the same as that set out in the Plan and does not change the policy, but rather phrases it in a different way. The text of the policy contained within the Plan is sufficient and the Council sees no merit in the change suggested. **No modification proposed.**

Change is suggested to Hou 4 (d) to identify the relevant timeframe as five years. considered necessary. The suggestion that this state 5 years is not accepted. The policy sets out that it applies where there is a shortfall in the maintenance of the 5-year housing land supply and I is not necessary to restate this in Hou 4 (d). **No modification proposed.**

Policy Hou 4 (d) requires that proposals are effective or capable of becoming effective in the relevant timeframe. **No modification proposed.**

Change suggested to Hou 4 (e) would remove the requirement for infrastructure to be delivered at the appropriate time. The wording of Hou 4 (e) reflects proposed plan policy Inf 3 Infrastructure Delivery and Developer Contributions. It is essential that infrastructure is not just committed but can be delivered at the appropriate time to absorb the additional impact of development. SDP Policy 9 (b) (CD087) requires Local Development Plans to provide policy guidance that will require sufficient infrastructure to be available or its provision to be committed before development can proceed. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Taylor Wimpey and Hallam Land Management Ltd (0603)

Hou 4 (c) requires that proposals are sustainable development. SDP Policy 7 (CD087) allows housing development on greenfield land, subject to the following criteria; the development will be in keeping with the character of the settlement and local area, the 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. City Plan Policy Hou 4 interprets this for Edinburgh. It reflects Part 2 of Policy Hou 1 in the adopted LDP (CD042). The adopted Edinburgh Local Development Plan (CD037) policy Part 2 of Hou 1 was included following the Examination of the Plan (CD158). In addition to the criteria set out in SDP Policy 7 the Reporter recommended that an additional criterion on sustainability be included to reflect the objectives of SPP 2014 (CD096).

SPP 2014 sets out a presumption in favour of development that contributes to sustainable development. City Plan Policy Hou 4 (c) requires that proposals are sustainable development. The policy therefore goes further than SPP 2014 (CD096) by requiring that development does not just contribute to sustainable development but is itself sustainable development. An outcome of City Plan is for Edinburgh to be a sustainable city. The Council has set target for the city to be net zero by 2030. Addressing climate change is central to City Plan. To achieve the objectives of the Plan future growth of the city must meet the ambition to be a climate ready city where new homes are built to the highest emissions quality standards in resilient, connected neighbourhoods, in the right locations, with the right infrastructure. The requirement for sustainable development on unallocated green belt or countryside is aligned with the objectives of the emerging policy in draft NPF4 (CD099) and the sustainability related policies of City Plan. Sustainable development is defined in the Glossary of the Plan as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.' This is the definition provided in SPP 2014 (CD096). **No modification proposed.**

Dunedin Canmore Housing Limited (0766)

The aim of the Plan is to deliver mixed use sustainable communities on the allocated land supply set out in Part 4, Table 2 and other suitable sites within the urban area. A



generous land supply is identified on page 29 of the Plan which should ensure that there is more than sufficient effective land. Policy Hou 1 supports housing on sites within the urban area that are not allocated, allowing for other sites to come forward. SPP 2014 (CD096) requires that a 5-year supply of effective housing land is always maintained. Policy Hou 4 provides for this circumstance and allows housing development within the countryside or green belt area. **No modification proposed.**

Hallam Land Management (0615), Mr T Klan (0307), Tarmac (0244)

The Plan aims to direct new development to, and maximise the use of, brownfield land rather than greenfield land and to deliver mixed use sustainable communities on the allocated land supply set out in Part 4, Table 2 and other suitable sites within the urban area. A generous land supply is identified on page 29 of the Plan which should ensure that there is more than sufficient effective land to avoid the need for release of countryside or green belt land. The amount and range of land is sufficient and is covered in Issue 20 Assessment of Housing Land Supply. Spatial strategy is covered under issue 2 Spatial Strategy.

The Edinburgh Green Belt plays an important role in directing the planned growth of the city, protecting and enhancing the quality, character, landscape setting and identity of the city and neighbouring towns, protecting and giving access to open space within and around the city and neighbouring towns. Policy Env 18 controls development in the green belt and countryside to enable it to fulfil its important role. It does not allow for housing development except in exceptional circumstances. Policy Hou 4 allows for housing development within the countryside or green belt area should there be an identified shortfall in the 5-year housing land supply. Policy Hou 4 is consistent with SDP Policy 7 (CD087). SDP Policy 7 allows housing development on greenfield land, to maintain the 5-years effective housing land supply, subject to the following criteria (a) the development will be in keeping with the character of the settlement and local area, (b) the development will not undermine green belt objectives, and (c) any additional infrastructure required as a result of the development is either committed or to be funded by the developer. Policy Hou 4 interprets this for Edinburgh. It reflects Part 2 of Policy Hou 1 in the adopted Edinburgh Local Development Plan, November 2016 (CD039). The adopted LDP Policy Part 2 of Hou 1 was included following the Examination of the Plan (CD158). In addition to the criteria set out in SDP Policy 7 the Reporter recommended that an additional criterion on sustainability be included to reflect the objectives of SPP 2014. **No modification proposed.**

Paragraph 4 of PAN 2/2010 (CD118) states that regular monitoring of housing completions and the progress of sites through the planning process can be achieved through the preparation of a housing land audit carried out annually in conjunction with housing and infrastructure providers. It is not considered necessary to refer to this within the Plan. The Edinburgh Housing Land Audit (CD055) is produced annually and reported to Planning Committee. It is agreed with Homes for Scotland. The current reference to the housing land audit within the policy is considered to be sufficient. **No modification proposed.**

Change is suggested to Hou 4 (d) to identify the relevant timeframe as five years. The suggestion that this state 5 years is not accepted. The policy sets out that it applies where there is a shortfall in the maintenance of the 5-year housing land supply. It is not necessary to restate this at Hou 4 (d). **No modification proposed.**

The addition of a clause to state 'Proposals that do not accord with the development plan will not be considered acceptable unless material considerations indicate otherwise' is unnecessary. This is the basis for the plan-led system and is set out in Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101). **No modification proposed.**

Hallam Land Management (0457), Robertson Residential Group (0537)

The change suggested is to remove Policy Hou 4 (a). Policy Hou 4 (a) requires that proposals are in keeping with the character of the settlement and local area. This reflects SDP Policy 7 (CD087). It is in line with proposed plan Policy Env 1 Design Quality and Context and Env 4 Development Design – Impact on Setting, which encourage design which draws upon positive characteristics of the surrounding area and where it will have a positive impact on its surroundings including the quality and character of the wider townscape. **No modification proposed.**

The change suggested is to remove Policy Hou 4 (b). Policy Hou 4 (b) requires that proposals will not undermine green belt objectives. This reflects SDP Policy 7 (CD087). Edinburgh's green belt plays an important role in directing the planned growth of the city, protecting and enhancing the quality, character, landscape setting and identity of the city and neighbouring towns, protecting and giving access to open space within and around the city and neighbouring towns. Policy Hou 4 (b) is required to ensure that the Edinburgh Green Belt continues to meet its objectives while accommodating growth requirements. **No modification proposed.**

The change suggested is that the words "will only be permitted" are changed to "will be supported". The language used reflects that this is an exceptional policy. The change is not accepted. **No modification proposed.**

Landowner of East Foxhall (0544)

The Housing Land Audit (CD055) is produced annually and reported to Planning Committee. It is agreed with Homes for Scotland. It is not considered necessary to refer to this within the Plan. The current reference to the housing land audit within the policy is considered to be sufficient. **No modification proposed.**

Pawel Stankiewicz (0445)

The change suggested is to remove Policy Hou 4 (a). Policy Hou 4 (a) requires that proposals are in keeping with the character of the settlement and local area. This reflects SDP Policy 7 (CD087). It is in line with proposed plan Policy Env 1 Design Quality and Context and Env 4 Development Design – Impact on Setting, which encourage design which draws upon positive characteristics of the surrounding area and where it will have a positive impact on its surroundings including the quality and character of the wider townscape. **No modification proposed.**

The change suggested is to remove Policy Hou 4 (b). Policy Hou 4 (b) requires that proposals will not undermine green belt objectives. This reflects SDP Policy 7 (CD087). Edinburgh's green belt plays an important role in directing the planned growth of the city, protecting and enhancing the quality, character, landscape setting and identity of the city and neighbouring towns, protecting and giving access to open space within and around the city and neighbouring towns. The policy does not preclude development in the green

belt where the objectives of the green belt are maintained. Criteria (b) is required to ensure that the Edinburgh Green Belt continues to meet its objectives while accommodating growth requirements. **No modification proposed.**

Stirling Developments Limited (0303)

The housing land supply is monitored and reviewed through the Housing Land Audit and Completions Programme which is prepared annually. **No modification proposed.**

Taylor Wimpey and Hallam Land Management Ltd (0603), The Association for the Protection of Rural Scotland (0334)

The inclusion of Policy Hou 4 is considered to be necessary. The aim of the Plan is to deliver mixed use sustainable communities on the allocated land supply set out in Part 4, Table 2 and other suitable sites within the urban area. SPP 2014 (CD096) requires that a 5-year supply of effective housing land is always maintained. A generous land supply is identified on page 29 of the Plan which should ensure that there is more than sufficient effective land to avoid the need for release of countryside or green belt land. SDP Policy 7 allows housing development on greenfield land, subject to a number of criteria, where this is required to maintain the 5-years' effective housing land supply. Policy Hou 4 in the Plan sets the policy for Edinburgh. It reflects Part 2 of Policy Hou 1 in the Edinburgh Local Development Plan 2016 (CD042). Part 2 of Hou 1 was included in the adopted LDP following the Report of Examination (CD158). The Reporter recommended that the policy be included to provide a policy basis to apply to sites outwith the allocated sites and the urban area and to allow for the local translation of SDP Policy 7. **No modification proposed.**

The Edinburgh Green Belt plays an important role in directing the planned growth of the city, protecting and enhancing the quality, character, landscape setting and identity of the city and neighbouring towns, protecting and giving access to open space within and around the city and neighbouring towns. Hou 4 (b) is required to ensure that the Edinburgh Green Belt continues to meet its objectives while accommodating growth requirements. The inclusion of Hou 4 (b) does not prevent the decision maker weighing the impacts on the green belt objectives against other matters. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 22	Housing Development Policy	
Development plan reference:	Part 3: Policies - page 121, Policy Hou 1 Housing Development	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Ambassador Group (0683) Cala Management Ltd (0465) CBRE Global Investors (0644) Cockburn Association (0777) Crosslane Co-Living SPV 2 Limited (0687) Crosswind Developments Ltd (0184) Dunedin Canmore Housing Limited (0766) Forth Ports (0497) Hallam Land Management (0599) Hallam Land Management (0615) Hazeldene House Limited (0695) Homes for Scotland (0404) Howard Jones (0424) HUB Residential (0582)		Inverdunning (Hatton Mains) Ltd (0427) Leith Harbour and Newhaven Community Council (0776) Melford Developments Ltd (0308) Miller Homes Limited (0649) Mr T Klan (0307) Nuveen Real Estate (0734) Scottish Property Federation (0144) Stirling Developments Limited (0303) Tarmac (0244) Theo Spanellis (0415)
Provision of the development plan to which the issue relates:	Policy Hou 1 sets out where housing development will be supported.	
Planning authority's summary of the representation(s):		
<u>Nuveen Real Estate (0734), CBRE Global Investors (0644) -Support</u>  Fully support Policy Hou 1 in allowing for housing development in a range of locations, including defined town, local and commercial centres. Supporting paragraph 3.177 considered to be progressive and appropriate. Housing complements existing retail floorspace and helps to best utilise available land and create sustainable mixed use communities within the urban area. In such circumstances, increased land efficiencies and densities around existing amenities and infrastructure is sustainable and wholly desirable in planning and commercial terms.  <u>Crosswind Developments Ltd (0184)-Support</u>  Supportive of Policy Hou 1 Housing Development. In particular the inclusion of H61 in Part 4, Table 2 Housing Proposals.  <u>Ambassador Group (0683)</u>  Fully supports Policy Hou 1 in allowing for housing development in a range of locations, including defined town, local and commercial centres, subject to the preparation of an overarching masterplan. Supporting paragraph 3.177 is considered to be progressive and appropriate, recognising that through redevelopment, housing could complement existing retail floorspace and utilise available land to create sustainable mixed-use communities within the urban area. However, consider that the requirement for a Place Brief or		

masterplan in order for housing to come forward in a commercial centre is overly prescriptive and should be considered on a case by case basis.

Cala Management Ltd, (0465) Hallam Land Management (0599), Miller Homes Limited (0649)

Consider requiring brownfield land to be delivered in advance of green belt release is not realistic or consistent with the housing delivery objectives of SESplan (2013) or national planning policy set out in SPP 2014.

Policy Hou 1 Housing Development should recognise that further land can be release on brownfield or greenfield sites and direct the user to Policy Hou 4 Housing Land Supply.

Cockburn Association (0777)

Support Hou1 subject to in some instances, the sites allocated are not genuine effective housing sites as constraints may mitigate against development.

More reassurance is required that this policy is not a 'trojan horse' for development of greenbelt land.

Dunedin Canmore Housing Limited (0766)

Does not consider that all development should be directed to brownfield land rather than greenfield, instead an opportunistic approach should be taken with a greater focus on deliverability to ensure that housing needs are met, particularly affordable housing provision.

Many of allocated sites are currently in active alternative use with no immediate prospect of conversion to housing. To ensure deliverability, and to meet the expected housing requirements throughout the lifetime of the plan, there needs to be allowances for other sites to come forward.

Forth Ports (0497)

Proposed Plans commitment to the use of Compulsory Purchase Powers has the potential to undermine the City's fabric, including the Port of Leith, in seeking to address the need for housing, the proposal fails to recognise the wider impact and implications for the City's economy and infrastructure.

Hallam Land Management (0615), Tarmac (0244)

Consider there is a need to allocate a range of housing sites, including greenfield sites, to be in a position to confidently argue a case that sufficient effective housing land is provided in the Plan.

Hazeldene House Limited (0695), Crosslane Co-Living SPV 2 Limited (0687), HUB Residential (0582), Ambassador Group (0683)

To meet the growing housing need, Edinburgh must seek to deliver new homes through a wide range of development options. Policy Hou 1 should acknowledge there are a range

of new and innovative approaches to development, including Build to Rent, which will all need to play a role. This sector can increase the quality and supply of modern sustainable homes more quickly and should be encouraged as a sector to increase the supply of homes for the city.

The majority of policies specific to mainstream residential use set out in the Proposed Plan are not directly applicable to the Build to Rent model. Build to Rent housing should be subject to separate policies tailored to this new model.

#### Homes for Scotland (0404)

Support for other sites in urban area welcome but needs to be part of a balanced development strategy.

#### Howard Jones (0424)

Refers to supporting text of Hou 1 at paragraph 3.176 and does not agree with forcing land to be used for development that is currently valuable greenspace, Concerned that should areas of greenspace be offered-up for development, with the supposition of providing a certain scheme, that the council will subsequently fail to provide sufficient funds to create this and then sell onto a less considerate and profit-driven developer who will utilise what was greenspace for their personal profit; at the expense of local residents and members of the public who live/work/travel alongside this space daily.

#### Inverdunning (Hatton Mains) (0427)

Accept general principles of place based approach but should remain as a guide for certain areas rather than specifically linked to proposed allocations. Place-based policies include areas where specific allocations should be removed given their windfall nature. The place policies can guide development within each area as it comes forward.

#### Leith Harbour and Newhaven Community Council (0776)

Support in principle but suggest inclusion of small industrial units as well as commercial as many appear to be taken over by housing developments and result in local jobs and skills are being lost, they also support heritage of area, particularly in Leith.

#### Melford Developments Ltd (0308)

Object to the sites identified in Part 4 Table2 as this appears to give these areas an in-principle planning advantage, without any planning or feasibility work being available.

Hou 1 in relation to urban sites will affect the marketing value of land and the price of housing. In conjunction with other policies and requirements this will not assist the re-development of sites, particularly those with high development or regeneration costs. A general presumption in favour of urban land is all that is required for this policy.

Too much housing is being proposed on previously allocated economic led sites. Some sites are not on the market or available for development.

The Plan potentially increases the affordability crisis in the city by restricting available land for housing and orientating these on more difficult sites. Emphasis on brownfield sites high-risk and potentially undeliverable.

Mr T Klan (0307)

Considers that there is little evidence that policies in the Plan will provide required housing in mixed-use sustainable communities. A mixed approach to brownfield /greenfield release across the city is needed.

Scottish Property Federation (0144)

Consider that the intention to direct new development towards brownfield land should retain the current SPP requirement for brownfield to be considered first. Without this flexibility, the city is again constraining its own ability to support new developments in non-brownfield locations that could bring forward new homes and business premises much earlier than an alternative brownfield site could achieve.

Stirling Developments Limited (0303)

The support for other sites in the urban area is welcomed but needs to be part of a balanced development strategy. Brownfield development has always happened, but in coexistence with greenfield. The Plan needs to incorporate flexibility to allow effective greenfield sites to support the delivery of housing.

Theo Spanellis (0415)

The Housing Development Policy should focus mainly on reclaiming empty, uninhabited abandoned flats, and developing areas that have already been used for domestic/industrial purposes, e.g., old warehouses, factories, old housing developments, and leave the development of mainly green spaces into housing as a last resort.

**Modifications sought by those submitting representations:**

Ambassador Group (0683)

Delete requirement for a Place Brief or masterplan at Hou 1 (b)

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazeldene House Limited (0695), HUB Residential (0582)

Policy Hou 1 should acknowledge there are a range of new and innovative approaches to development, including Build to Rent and serviced residential living which will all need to play a role.

Build to Rent housing should be subject to separate policies.

Cala Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Add:

c. where they accord with Policy Hou 4

Cockburn Association (0777)

No change suggested

Dunedin Canmore Housing Limited (0766)

Policy should allow for opportunistic development of brownfield and greenfield land.

Forth Ports (0497)

Page 121, paragraph 3.176

Delete the last sentence of the paragraph which reads, "On sites in private ownership the Council will, where necessary, intervene to ensure that land comes forward utilising compulsory purchase powers if required."

Hallam Land Management (0615), Tarmac (0244)

Alter part (a) to "on other sites within or adjacent to the urban area, provided proposals are compatible with other policies in the Plan and,"

Homes for Scotland (0404)

Support for other sites in urban area welcome but needs to be part of a balanced development strategy.

Howard Jones (0424)

Implies change to paragraph 3.176 as does not agree with forcing land to be used for development that is currently valuable greenspace.

Inverdunning (Hatton Mains) Ltd (0427)

Amend paragraph 3.175 to: "Place Policies and Development Principles (and technical requirements in Appendix D) set out the key elements to be delivered on allocated housing sites and on potential windfall sites during the plan period."

Leith Harbour and Newhaven Community Council (0776)

At 3.177 include small industrial units as well as commercial as many appear to be taken over by housing developments and result in local jobs and skills are being lost, they also support heritage of area, particularly in Leith.

Melford Developments Ltd (0308)

A general presumption in favour of urban land is all that is required for this policy.

Mr T Klan (0307)

Request alteration to Hou 1 (a) to 'on other sites within or adjacent to the urban area, provided proposals are compatible with other policies in the plan and;

Stirling Developments Limited (0303)



Effective greenfield sites should be supported if it can be demonstrated that the brownfield strategy is failing.

Policy Hou 1 should acknowledge there are a range of new and innovative approaches to development, including Build to Rent which should be subject to separate policies

Amend section 2.2 point 2 to:

“Directing new development to, and maximising the use of, brownfield land rather than greenfield land, unless where brownfield land is ineffective as demonstrated through a robust review of the effective land supply, improving and re-imaging Edinburgh’s neighbourhoods, rebuilding the city from within and delivering new communities in Edinburgh Waterfront, West Edinburgh and on other major development sites across the city, but supporting established effective settlements.”

Scottish Property Federation (0144)

Require brownfield first with flexibility to allow new developments in non-brownfield locations which could deliver much earlier than brownfield sites.

Theo Spanellis (0415)

Focus policy on reclaiming empty, uninhabited abandoned flats, and developing areas that have already been used for domestic/industrial purposes and leave the development of mainly green spaces into housing as a last resort.

#### **Summary of responses (including reasons) by planning authority:**

Ambassador Group (0683)

Hou 1 (b) supports proposals for housing as part of redevelopment proposals in a commercial centre subject to retention of its function as a commercial centre and a Place Brief or masterplan of the overall site area in accordance with plan policies. The Council encourages a comprehensive approach to redevelopment and regeneration wherever possible, and the preparation of place briefs and masterplans to identify the full design potential for creating successful places. Piecemeal development is less likely to lead to the creation of well-defined and cohesive networks of streets and spaces. Env 2 Co-ordinated Development encourages this approach. **No modification proposed.**

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazeldene House Limited (0695) HUB Residential (0582)

It is not agreed that Policy Hou 1 should acknowledge the range of approaches to development. This is outwith the scope of the policy, the purpose of which is to identify locations where housing development is supported. Build to rent is considered to be a strand of mainstream housing. **No modification proposed.**

Cala Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

It is not agreed that an additional criterion should be added to support housing development which accords with Policy Hou 4. Policy Hou 1 is concerned with delivering

the allocated land supply and other sites in line with the spatial strategy of the plan. Policy Hou 4 allows for development in the countryside or green belt in circumstances where there is a shortfall in the maintenance of the 5-year housing land supply. It is not necessary to include a cross reference as the Plan should be read as a whole. **No modification proposed.**

Cockburn Association (0777)

Policy Hou 1 supports housing development on allocated sites. Allocated sites are considered under Issue 20 Assessment of Housing Land Supply. A generous land requirement combined with the sites allocated should ensure that if any sites do not come forward as expected there is more than sufficient identified land supply to meet the requirement without the need for release of green belt. **No modification proposed.**

Dunedin Canmore Housing Limited (0766)

In addition to allocated sites Policy Hou 1 supports proposals for housing on other sites in the urban area, provided proposals are compatible with other policies in the plan. This allows for opportunistic development within the urban area. The Plan aims to direct new development to, and maximise the use of, brownfield land rather than greenfield land. A generous land supply has been identified to meet the housing land requirement which is addressed under Issue 20 Assessment of Housing Land Supply. Allowing opportunistic development of greenfield land is not necessary or in line with the spatial strategy of the Plan. Policy Hou 4 allows for housing within the green belt or countryside where there is a shortfall in the maintenance of the 5-year housing land supply. **No modification proposed.**

Forth Ports (0497)

Scottish Government Guidance, Compulsory Purchase Orders and Acquiring Authorities: Guidance on CPO Use, 2018 (CD0120) encourages authorities to consider using their CPO powers when necessary and appropriate. The Council acknowledges in paragraph 3.176 of the Plan that, should it be necessary, it may have to use its compulsory purchase powers. This is addressed further in Issue 3 Delivery of the Strategy. The Council is only likely to instigate compulsory purchase powers with regard to specific identified sites where there is market failure, and this failure has implications in terms of delivering the strategy and more specifically the housing land supply. It is considered appropriate to refer to the availability of these powers within the supporting text. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

It is not accepted that part a of Policy Hou 1 should allow for development on areas adjacent to the urban area. Outwith the urban area land is identified as countryside or green belt. Development in the countryside and green belt is not supported except in the circumstances set out in Env 18 Development in the Green Belt and Countryside and Policy Hou 4 Housing Land Supply. **No modification proposed.**

Homes for Scotland (0404)

Policy Hou 1 supports housing development on allocated sites, other sites within the urban area and as part of redevelopment proposals in commercial centres. The support for other sites within the urban area is part of a balanced strategy. Sites include undeveloped greenfield allocations from the adopted Edinburgh Local Development Plan (CD039) alongside urban brownfield and strategic sites which include greenfield land. **No modification proposed.**

Howard Jones (0424)

Paragraph 3.176 of the Plan encourages development of housing on sites, not allocated for other uses, within the urban area. It does not imply that valuable greenspace will be forcibly developed. The proposals map identifies area of open space. Policy Env 23 Protection of Open Space protects all open spaces designated or which otherwise contribute to the amenity of their surroundings and the city; and or provide or are capable of providing for the recreational needs of residents and visitors; and/or are part of the city's landscape and townscape character; and or part of its biodiversity and green/blue network. Where there is a loss of open space Policy Env 23 (d) requires that there is a local benefit, proportionate to the scale of the development in terms of either alternative equivalent provision being made or improving an existing public park or open space. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

It is not accepted that the specific allocations are windfall in nature and should be removed. Land supply and identification of sites is addressed in Issue 20: Assessment of Housing Land Supply. It is therefore not accepted that 3.175 should refer to allocated sites and windfall sites. **No modification proposed.**

Leith Harbour and Newhaven Community Council (0776)

Text at paragraph 3.177 of the Plan relates to the redevelopment of commercial centres to include housing to complement existing floorspace. Many small industrial units are located within the general urban area, which is supported by Policy Hou 1 (a), and could therefore be brought forward for housing development. It is therefore unnecessary to set out specific support for housing in these locations beyond that stated at Policy Hou 1 (a). **No modification proposed.**

Melford Developments Ltd (0308)

The general presumption in favour of urban land suggested is not considered sufficient to direct housing development in line with the spatial strategy. Policy Hou 1 supports housing on the allocated sites which include a range of locations and other sites within the urban area. In addition, it provides support for housing as part of redevelopment proposals in a commercial centre which recognises that housing could complement existing floorspace and utilise available land to create sustainable mixed-use communities within the urban area in line with the aims of the plan. **No modification proposed.**

Allocated sites are considered to be deliverable within the Plan period. Allocated sites and their delivery are addressed in Issue 20 Assessment of Housing Land Supply and individual sites are addressed under Issues 4-8 Proposed Sites. **No modification proposed.**

Policy Hou 1 supports housing development on allocated sites, other sites within the urban area and as part of redevelopment proposals in commercial centres. Sites include undeveloped greenfield allocations from the Edinburgh Local Development Plan 2016 alongside urban brownfield and strategic sites which include greenfield land. **No modification proposed.**

Sites and proposals vary in nature and not all policies of the development plan will be applicable to each proposal. Development plan policies set out where and how development should be carried out. Development plan policies should be considered by developers in their decisions on land options and acquisition. **No modification proposed.**

Mr T Klan (0307)

It is not accepted that Hou 1 (a) should allow for development on areas adjacent to the urban area. Outwith the urban area land is identified as countryside or green belt. Development in the countryside and green belt is not supported except in the circumstances set out in Env 18 Development in the green belt and countryside. **No modification proposed.**

Scottish Property Federation (0144)

Policy Hou 1 supports the development of allocated sites which includes both brownfield and greenfield land. It supports housing on other sites in the urban area and as part of redevelopment proposals in a commercial centre. A generous land supply has been identified to meet the housing land requirement which is addressed under Issue 20 Assessment of Housing Land Supply. Allowing development of greenfield land is not necessary or in line with the spatial strategy of the plan. Notional programming is set out for allocated sites at Appendix 1 to Issue 20 Assessment of Housing Land Supply (CD176). This identifies that sites will be delivered throughout the period of City Plan 2030 including in the early years. Policy Hou 4 allows for housing within the green belt or countryside where there is a shortfall in the maintenance of the 5-year housing land supply. **No modification proposed.**

Stirling Developments Limited (0303)

It is not accepted that the Policy Hou 1 should support effective greenfield sites. The Plan aims to direct new development to and maximise the use of brownfield land rather than greenfield land. This accords with the policy principle of SPP 2014 (CD096) that consideration should be given to the re-use or redevelopment of brownfield land before new development takes place on greenfield sites. Spatial strategy is dealt with under Issue 2 Spatial Strategy. Issue 20 addresses the issue of land supply and identifies that there is sufficient volume and range of sites. Policy Hou 4 allows for the development of greenfield sites should there be a shortfall in the housing land supply. **No modification proposed.**

Hou 1 sets out where housing development is supported. Policy Hou 4 sets out policy which will apply where the sites provided for in Hou 1 are not sufficient to maintain the 5-year housing land supply. This allows for development within the countryside or green belt area. **No modification proposed.**

It is not agreed that Policy Hou 1 should acknowledge the range of approaches to development. This is outwith the scope of the policy which identifies locations where housing development is supported. Build to rent is considered to be a strand of mainstream housing. **No modification proposed.**

It is not necessary to add text at paragraph 2.2 (2) to set out the circumstances in which green field development may come forward. This section sets out the aims of the Plan which is to maximise the use of brownfield land and it is not necessary to set out exceptions. Policy Hou 4 sets out policy where there is a shortfall in the maintenance of the 5-year housing land supply. **No modification proposed.**

Theo Spanellis (0415)

Policy Hou 1 and other policies of the Plan direct development towards brownfield or existing allocations and protect greenfield sites from development. Policy Hou 1 supports the development of the allocated sites to deliver the housing land requirement in the period of the plan. The majority of sites are within the existing urban area on land which has previously been developed or previously allocated sites which have yet to be developed. A number of these sites have been or are in use for industry. In addition, the policy supports housing development on other sites within the urban area and redevelopment of commercial centres. Policy Env 23 protects open space except in certain circumstances, Env 18 controls development in the green belt and supports housing only in limited circumstances. Policy Hou 4 allows for development within the countryside and green belt where there is a shortfall in the maintenance of the 5-year housing land supply. **No modification proposed.**

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 23</b>	<b>Affordable Housing</b>	
<b>Development plan reference:</b>	Part 3: Policies- page 121, Policy Hou 2 Affordable Housing	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <p>Affordable Housing consultant, JLA (0756)</p> <p>Ambassador Group (0683)</p> <p>Archie Clark (0003)</p> <p>AREAA (0358)</p> <p>Arnold Clark Automobiles Ltd (0750)</p> <p>Astley Ainslie Community Engagement Group (AACEG) (0275)</p> <p>Barratt David Wilson Homes (0677)</p> <p>BDW Trading (0350)</p> <p>CALA Management Ltd (0465)</p> <p>CBRE Global Investors (0644)</p> <p>Cockburn Association (0777)</p> <p>Crosslane Co-Living SPV 2 Limited (0687)</p> <p>Crosswind Developments Ltd (0184)</p> <p>Dandara East Scotland (0757)</p> <p>Defence Infrastructure Organisation (0124)</p> <p>Dunedin Canmore Housing Limited (0766)</p> <p>Edinburgh Dog and Cat Home (0310)</p> <p>Edinburgh Poverty Commission (0717)</p> <p>Edinburgh World Heritage (0339)</p> <p>Elaine Sosinka (0721)</p> <p>Grange/Prestonfield Community Council (0192)</p> <p>Hallam Land Management (0599)</p> <p>Hallam Land Management (0615)</p> <p>Hazledene House Limited (0695)</p> <p>Homes for Scotland (0404)</p> <p>HUB Residential (0582)</p> <p>J. Smart &amp; Co. (Contractors) PLC (0483)</p> <p>James Forbes (0647)</p> <p>Juniper Green &amp; Baberton Mains Community Council (0306)</p> <p>KR Developments Group Limited (0263)</p> <p>Lady Road Investment S.A.R.L. (0625)</p> <p>Leith Central Community Council (0614)</p> <p>Leith Harbour and Newhaven Community Council (0776)</p> </div> <div> <p>LPBZ Commercial Ltd (0391)</p> <p>Lynn Grattage (0362)</p> <p>Mark Ockendon (0419)</p> <p>Melford Developments Ltd (0308)</p> <p>Morag MacLean (0326)</p> <p>New Town &amp; Broughton Community Council (0254)</p> <p>Nuveen Real Estate (0564)</p> <p>Nuveen Real Estate (0734)</p> <p>Parabola Edinburgh Limited (0723)</p> <p>Peter Allen (0336)</p> <p>Robertson Residential Group (0537)</p> <p>Rosebery Estate (Bankhead) (0618)</p> <p>Ryden LLP (0578)</p> <p>SAICA (0590)</p> <p>Sapphire Land (0247)</p> <p>Scottish Property Federation (0144)</p> <p>Southside Community Council (0781)</p> <p>Spire Healthcare Limited (0719)</p> <p>Steve Loomes (0767)</p> <p>Stewart Milne Homes (0118)</p> <p>Suzanne McIntosh (0409)</p> <p>Tarmac (0244)</p> <p>Taylor Wimpey (0200)</p> <p>Taylor Wimpey and Hallam Land Management Ltd (0603)</p> <p>Telereal Trillium (0540)</p> <p>The Association for the Protection of Rural Scotland (0334)</p> <p>The Stoddart Family (0749)</p> <p>Tiger Developments Ltd (0602)</p> <p>Union Property Services Ltd/VRS Ltd (0584)</p> <p>University of Edinburgh (0464)</p> <p>Watkin Jones Group ((0516)</p> <p>Wright PDL (0078)</p> </div>		

<b>Provision of the development plan to which the issue relates:</b>	This section of the Plan sets out affordable housing policy to be applied to housing development.
<b>Planning authority's summary of the representation(s):</b>	
<p><u>The Association for the Protection of Rural Scotland (0334)-Support</u></p> <p>Supports the reasoning for the setting of a minimum 35% affordable housing target given the considerably greater need for social and affordable accommodation that exists in the city.</p> <p><u>Dunedin Canmore Housing Limited (0766)-Support</u></p> <p>Given the scale of affordable need, housing developments should support the delivery of new affordable homes as far as possible.</p> <p><u>NHS Lothian (0596) Support</u></p> <p>Supportive of the retention of an affordable housing policy. Consider delivering appropriate amounts of affordable housing, which is commercially viable to ensure supply, should be a key requirement of the Proposed Plan and any affordable homes delivered are across a variety of tenures and types.</p> <p>Consider that housing cannot be provided in isolation and are supportive of the CEC promoting affordable housing as an integral part of 20-minute walkable neighbourhoods that are high quality, high density and mixed-use, linked by better active travel and public transport infrastructure, green and blue networks and with essential community services brought closer to homes.</p> <p><u>Affordable Housing consultant, JLA (0756)</u></p> <p>Questions if an increase in affordable housing policy land risks a reduction in affordable housing delivery given that if it is unused after 60 months any land that comes through the Affordable Housing Policy reverts to the developer for market housing. No guarantee of pro rata increase in public sector housing grant funding to deliver units on the additional land. Questions if a significant per-unit net decrease in funding, allied to increased costs would bring an increased risk of non-delivery.</p> <p>Those delivering affordable housing policy developments may be compounded further in some cases by the requirement to provide housing as part of commercial developments and as such these developments are likely to attract reduced economies of scale and higher costs-per-unit to deliver than a more typical residential site. Concludes that it is reasonable to assume there will be an increase in the number of developments where a commuted sum is the only deliverable outcome, if the land is not to be "lost" through being timed out.</p> <p>Request that Council review and consult on affordable housing guidance to support the policy.</p>	

Ambassador Group (0683), HUB Residential (0582), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695)

Provision of 35% affordable housing across all housing sites is likely to affect site viability, and many urban brownfield sites will be marginal, and is not considered appropriate to increase delivery of housing, including affordable housing, across the board. Policy should remain at 25% and recognise all forms of affordable housing tenure and allow a broader approach to delivery.

Policy should acknowledge that Build to Rent operates a different model to traditional housing for sale, therefore a specific approach to affordable housing is necessary.

Affordable housing offer should be entirely Discounted Market Rent and managed by the Build to Rent provider to enable units to be fully integrated into the development.

Archie Clark (0003)

Considers 25% requirement as far too low and developers have found ways to pay unrealistically low commuted sums. Developers need to pay the full sum and provide the accommodation on their sites to avoid creating unbalanced communities. Suggest that surplus student housing should be converted into affordable housing. Assessment of the cumulative total of developments planned by a developer (including those of fewer than 12 units) should be undertaken to avoid submission of multiple applications for fewer units

AREAA (0358)

Object to the increase to 35 % and seek greater flexibility in the policy to ensure viability. Seek an amendment to include the allowance of a Viability Assessment.

Note that SPP and the draft NPF4 advises of a 25 % affordable housing requirement and consider that on this basis, an increase on 25% would require justification and should be sought on a case by case basis, rather than as a blanket policy requirement.

Astley Ainslie Community Engagement Group (AACEG) (0275)

Affordable and social rent housing should be integrated within the site.

Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

Insufficient clarity on how the increase to 35% may be implemented. Lack of information on methodology for analysing and processing the comments previous submitted.

Consider there to be insufficient evidence that 35% will increase the affordable housing supply. Increase may cause some sites to become unviable, particularly given the focus on brownfield land.

Request additional work is required to better evidence that this uplift will not lead to fewer sites coming forward, and potentially decreasing the delivery of affordable homes. Additional information is also required in terms of a City of Edinburgh Council/District Valuer viability assessment.



It would be particularly inappropriate, and a risk to viability, if the 35% affordable housing requirement was applied to any newly allocated sites identified in this Plan. Retroactive changes particularly risk affecting the viability of sites wherein significant investment may have already been made on the reasonable assumption that 25% affordable was to be required.

Before consideration can be given to the threshold, overall delivery needs to be dealt with in greater detail and more realistically. The threshold will be relatively academic if the overall delivery of new homes cannot be substantially increased. Caution is also needed in moving away from the clear national 25% threshold set out in SPP which is well understood and achievable in most areas. Regional variations could add uncertainty and create distortions in the market.

Consider it to be unbalanced to introduce untested mechanisms for seeking to unilaterally raise the requirement for affordable housing, which may lead to a decrease in the delivery of the associated (and required) private tenures.

Mix of affordable housing required should be reviewed, and where it can be evidenced that viability issues may exist, or where need for types of properties are evident, the split should be assessed. Should retain an ability to be flexible in seeking different types of affordable housing. Consider it is positive that the policy allows for tenure to be flexible, to remain consistent with local housing need which is consistent with the definition of affordable housing, defined at paragraph 126 of SPP.

Consider that additional funding would be required from the Scottish Government to deliver the new affordable housing policy, in line with current aspiration for 70% of these to be provided for social rent. There is insufficient evidence available to be certain that this funding is available, and that the burden will not be unreasonably passed onto RSLs.

Focus on brownfield will increase costs putting viability of affordable housing delivery at risk without further grant funding or a higher burden on the developer, or reduced numbers of units per development for Section 75. RSLs have advised that, in terms of self-delivery, it is unlikely that they would take on complex brownfield land developments. Overall, delivery is going to be challenging if the planning system does not allocate enough land of the right type to keep a steady release of new homes.

In Edinburgh, to render the uplift in the affordability requirement to 35% viable, this would have to be across all affordable tenures, include outright sale, enabling more people into home ownership in a challenging market for first time buyers and those looking for family space. The 70% as social rent approach is a national target, and it would be difficult to argue that there is not a need. The additional 10% is where the focus could be on additional tenures, particularly forms of affordable ownership. A needs-based assessment on a site-by-site basis is proposed for the remaining 10%.

Overall, the challenge in Edinburgh is going to be delivering enough housing of the right type and tenure, that meets the need to get to net zero at a price that is affordable across both the rental and ownership tenures. If all of the objectives of the Plan are to be realised then the level of public investment, risk and potentially reward will have to increase significantly.

Viability matters in this regard are not fully considered within the Proposed Plan, Documents referred to by the Council (e.g., District Valuer report and its review) have not been made public. This has severely undermined the consultation as the full suite of evidence has not been made available.

Given the scale of affordable need in the city and the large contribution that the private sector housing industry offers to the delivery of these homes the Plan should be doing more to assist in the delivery of all tenure housing. A range and choice of sites (brownfield and greenfield) would ensure a constant delivery of new homes annually.

The policy is not consistent with national policy nor is it supported by available evidence. A clear national policy contributes positively, providing a predictable environment for investment. A movement away from this with differences between authorities adds complexities and potential distortions to the housing market.

Considers that the Council has withheld the evidence it claims supports this policy. Understand there are important inconsistencies between the actual evidence and the way it is described in the Housing Technical Note. Have concerns about the status District Valuers report and its availability. It is not clear the extent to which the draft District Valuer Report or the Council has considered the 35% in the context of the viability considerations outlined in the Edinburgh Commercial Needs Study.

Should amend requirement to 25% affordable housing requirement, aligning with national policy. The policy should not be overly prescriptive on the types of affordable tenure permitted to enable flexibility over time and changes in funding to be adapted to.

CALA Management Ltd (0465), Hallam Land Management (0599)

Council has not made available for public consideration the supporting information, including the District Valuer assessment, it relies on to support of the increase from 25% to 35%.

There is no evidence that this increase, combined with the brownfield first strategy and suite of policies can actually be delivered or to support the assertion that the 35% requirement can be achieved within current subsidy budgets. Accordingly, policy should revert to the benchmark set out in SPP 2014 and the statutory development plan, SDP1 2013.

Crosswind Developments Ltd (0184)

Object to the blanket increase in the affordable housing requirement and seek greater flexibility to ensure viability. Seek an amendment to include the allowance of a viability assessment to ensure that the level of affordable housing contribution being requested does not render development in the city unviable.

An increase on 25 % would require justification to meet with SPP and should be sought on a case by case basis, rather than as a blanket policy requirement.

Cockburn Association (0777)

Support policy subject to the removal of "or as far as" within the supporting text.

#### Crosslane Co-Living SPV 2 Limited (0687)

Serviced residential living developments operate differently to traditional housing, being typically large-scale shared living developments under single management and subject to management plans. therefore, a specific approach to affordable housing is required. Due to their shared facilities, serviced residential living units are smaller than standard housing units, but offer a much higher level of amenity provision to residents and local community. Therefore, a financial contribution towards affordable housing is considered appropriate.

#### Defence Infrastructure Organisation (0124)

Supports the provision of affordable housing however concerned about the impact on redevelopment of more challenging sites, such as Redford Barracks, where the potential costs of adapting so many listed buildings are already high. Requests that policy is applied flexibly to sites where there are exceptional costs, and where clear evidence of these exceptional costs can be demonstrated.

#### Edinburgh Dog and Cat Home (0310)

Important that planning policies which require affordable housing strike a balance so that any requirements do not render a residential development unviable. Achieving strategic goals may not be achievable alongside affordable housing. Unless justified requirement should be reduced to 25% and include reference to viability in line with SPP.

Consider it is not necessary to include the word normally in relation to on site provision as exceptions to policies are already allowed for by material considerations and this addition is unnecessary and confusing and if retained clarification of what this means required.

Encourage additional text in the housing chapter to acknowledge the need for additional guidance on viability and delivery which should include the opportunity for future proposals on brownfield sites to include a report on viability and delivery.

#### Edinburgh Poverty Commission (0717)

Support 35% requirement and the statement that "The highest housing need in the city is for homes delivered for social rent." Consider there is confusion between the terms affordable and social housing and plan must be clear what its priorities and greatest needs are. Argue that an adequate supply of new housing for social rent is most necessary.

#### Edinburgh World Heritage (0339)

Consider it would be appropriate to add weight to address fact that diversity and cultural resilience is more of an issue in some areas, including the World Heritage Site.

#### Elaine Sosinka (0721)

Support 20 minute neighbourhood agenda. 'Mix of housing' should include social rent. Affordable housing commitment for each scheme should be on site, not off-set in another

locality. Edinburgh needs more social rent in the centre and council should not rely on developers to achieve this.

Grange/Prestonfield Community Council (0192)

Consider there to be too much off-site provision supported by the Council and there should be an early review of how 35% is working compared with previous 25%, as the cross- subsidy of 35% onto market housing may increase the cost of the latter and hence reduce its affordability.

Hallam Land Management (0615) Tarmac (0244)

Supports the aim that housing developments should support the delivery of new affordable homes. 35% requirement appears to be a random figure not been evidenced or supported by market tests and may make many allocated brownfield sites unviable and non-effective, particularly when open space requirements are also to be met. Rigid target will put more pressure on the need to identify greenfield releases and should influence the recommendations from the District Valuer in this regard.

Not convinced it will meet the affordable targets. Greater emphasis needed on how this can be delivered delivery within funding constraints. A more progressive form of affordable housing provision should be introduced otherwise there is a risk that the level of delivery expected will not be achieved. Minimum threshold for affordable should be 20 and with a sliding scale for affordable provision on larger sites.

James Forbes (0647)

Proposed increase to 35% is good but too easy for developers to avoid on-site provision of affordable housing through contribution to the cost elsewhere. Should be encouraging integrated communities through on-site affordable housing.

J. Smart & Co. (Contractors) PLC (0483)

No evidence provided to support the argument that a 35% affordable homes requirement will deliver more affordable homes and it is more likely to negatively impact on the development of housing sites resulting in less affordable housing being delivered. Will have a negative impact on land value and question if Council considered circumstances where a site's existing industrial use value is in excess of the residential value. Alongside other 'abnormal' costs associated to brownfield development, may dictate that there is no financial logic in the site owners obtaining vacant possession and redeveloping for residential use in turn, this is likely to further undermine the Proposed Plan's 'brownfield first' approach to delivering the City's housing targets during the plan period. Suggest existing 25% policy requirement is retained.

Juniper Green & Baberton Mains Community Council (0306)

Assessment of the cumulative total of developments planned by a developer (including those of fewer than 12 units) should be undertaken to avoid submission of multiple applications for fewer units. Practice of commuted sums must be resisted as they are frequently inaccurate, and housing needs to be provided within the community of the development.

KR Developments Group Limited (0263)

Consider requirement to provide 35% affordable housing could be counterproductive by making some projects unviable, possibly slowing down the provision of much needed new housing and a deterrent from investing in the city. May also deter further purpose built student accommodation investment and build to rent development.

Preferable to reduce or maintain the existing 25% requirements as this is familiar to development industry. Prescriptive approach requiring 35% affordable housing in Build to Rent will slow down the supply of this type of new home and potentially make proposals unviable. The additional need for 20% of the units to be made available for larger families is also too prescriptive, could also affect viability and may not reflect the market demand in some locations. Would be preferable for the Council to take a more pragmatic approach and discuss each proposal on its own merits and based on the locational and specific demand dynamics.

Lady Road Investment S.A.R.L. (0625), Tiger Developments Ltd (0602), Arnold Clark Automobiles Ltd (0750)

Considers that the requirement for a blanket 35% affordable housing policy will lead to many developments being unviable and will provide a risk to high quality housing being delivered.

Suggests policy should instead require applicants to consult with and deliver what social housing providers actually need in terms of the provision and mix of tenures and units to be delivered.

Encourage the Council to update and be more flexible in their definition of affordable housing.

Leith Central Community Council (0614)

Wish to see a target of 50% social housing in Leith and would like to see a clear definition of truly affordable housing as a ratio of the National Living Wage.

The affordable housing contribution in Leith Central Community Council area should be primarily for rent.

Asks what size of developments 35% requirement applies to.

Provision of 35% affordable housing should always be on site rather than "normally on site". Wording is not prescriptive as it only mentions units. Consider it should be a minimum of 35% of total habitable space.

Leith Harbour and Newhaven Community Council (0776)

Support in part the increase to 35% requirement however concerned that affordable housing should not be segregated and passed over to RSLs as this leads to stigma and provides houses not homes.

LPBZ Commercial Ltd (0391)

Addressing affordability will require an element of subsidised affordable housing, but this should not be seen as the only policy mechanism necessary, and the focus requires to be on providing more housing of all tenures. 35% is not supported by Scottish Planning Policy therefore suggest requirement should remain as 25%. If the Council pursue the additional 10% affordable units, then this should be presented in this policy as an option for developers which can provide them with a financial return, such as unsubsidized Low-Cost Home Ownership or the 10% could be used to provide housing for older people as required by the new Planning Act.

Lynn Grattage (0362)

Sites should provide 70% affordable housing.

Mark Ockendon (0419)

Considers that including a proportion of affordable housing in private developments is not a good solution and if there is a shortfall in affordable housing this should be addressed directly by the council or government and not passed to private developers.

Melford Developments Ltd (0308)

Object on basis that there is a lack of evidence presented to justify the changes proposed which would adversely affect delivery of sites by developers in conjunction with RSLs.

Morag MacLean (0326)

Would like to see more emphasis on social housing, rather than affordable housing. Term "affordable housing" implies that the rest of the development is "unaffordable. Developers should have to build social housing and housing that is actually affordable before they are allowed to build expensive luxury flats.

New Town & Broughton Community Council (0254)

Generally support an increase in provision but may be negative consequences in terms of impact on level of new housing and policy does not distinguish between categories of 'affordable housing' – being either Mid-Market Rent or 'Social Rent'.

Significant increase and not aware of any analysis of the effects and if this would actually increase the supply of truly affordable housing. Suggest alternative approach to focus on ensuring that, firstly, the 25% affordable housing requirement is delivered, and that 'affordable' housing is actually affordable.

Note that there is particular demand for social rent housing in Edinburgh and believe focus should primarily be on an improved definition of affordable housing and strengthened guidance on the inclusion of a Social Rent element.

Prefer to retain 25% requirement and include, either on-site or, if justified, at a nearby city centre location, a significant percentage of this being truly affordable housing. Updated

guidance could also include a more relevant definition of affordable housing, reflecting the average wage.

Nicola McCowan Hill (0195)

Consider that before consideration given to the affordable housing threshold overall delivery needs to be dealt with in greater detail and more realistically. Threshold will be academic if overall delivery of new homes cannot be substantially increased. Caution needed in moving away from the clear national 25% threshold set out in SPP as threshold is well understood and achievable in most areas. Regional variations could add uncertainty and create distortions in the market for new housing land. 35% across all brownfield sites may render sites unviable. Flexibility in terms of the percentage to deliver affordable homes should be carefully considered.

Consider it positive that the policy allows for tenure to be flexible, to remain consistent with local housing need. The policy should remain flexible. A degree of flexibility is consistent with SPP which states: "Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development." (Paragraph 109)

Consider there to be insufficient evidence that 35% will increase the affordable housing supply. Increase may cause some sites to become unviable, particularly given the focus on brownfield land.

Request additional work is required to better evidence that this uplift will not lead to fewer sites coming forward, and potentially decreasing the delivery of affordable homes. Additional information is also required in terms of a City of Edinburgh Council/District Valuer viability assessment.

It would be particularly inappropriate, and a risk to viability, if the 35% affordable housing requirement was applied to any newly allocated sites identified in this Plan. Retroactive changes particularly risk affecting the viability of sites wherein significant investment may have already been made on the reasonable assumption that 25% affordable was to be required.

Parabola Edinburgh Limited (0723)

Consider there would be serious challenges in delivering the type of housing proposed at Edinburgh Park if more than 25% affordable housing requirement was sought.

Encourage the Council to update their definition of affordable housing, in recognition of the range of alternative models that can help in securing affordable homes for the city.

Peter Allen (0336)

Community-led collective custom build has a proven ability to deliver and support the principles set out in the Plan including affordable housing. Would therefore like to see this method of delivering housing and commercial / community facilities referenced throughout the Plan both to encourage take-up and to ensure that Council sets aside parcels of land for this purpose.

Robertson Residential Group (0537)

Disagree with the level of affordable housing provision sought and consider it should be amended to a minimum of 25% of the total number of units proposed.

On the basis of SPP and NPF4 consider proposed increase would not be in the best interests of some of the larger housing sites and may unnecessarily contribute to viability challenges, particularly given the overreliance on piecemeal brownfield housing sites and this will lead to less housing completions overall, as well as a lower number of affordable houses being delivered in the Plan period.

Limited evidence provided on whether increasing the affordable housing requirement to 35% will result in the delivery of more affordable homes on the ground. Note that 25% is a tried and tested percentage which is achievable in most areas across Scotland.

Suggest some flexibility to ensure the viability of private housing developments and ensure that affordable housing requirements do not act as a barrier to development. Consider there is scope for the Council to work in partnership with the development industry to secure unique and innovative solutions to affordable housing delivery and ultimately more private housing completions would lead not only to housing completions but in turn provide a higher contribution to affordable housing.

Any increase in the affordable housing requirement needs to be given priority over increasing the financial burden on homebuilders and landowners in other policy requirements of the Plan and therefore this matter needs to be considered holistically.

#### Rosebery Estate (Bankhead) (0618)

Increase to 35% should only be applied to new sites identified in plan as many sites being carried forward have been subject to significant work and investment.

#### Spire Healthcare Limited (0719)

Consider increase to a minimum of 35% for affordable housing may unnecessarily contribute to viability challenges in delivering some allocated sites and some future windfall sites, particularly as a specific justification of evidence of need is not provided for all sites. As the housing delivery element of the Plan has an over-reliance on brownfield housing sites this will lead to less housing completions overall and will also affect the delivery of housing for older people / specialist housing.

Requirement should remain at 25%, as has been the standard set by SPP, unless the Council has site specific evidence on a requirement for a higher provision to be set within the requirements of specific allocations in City Plan.

#### SAICA (0590), Nuveen Real Estate (0564), Nuveen Real Estate (0734), CBRE Global Investors (0644)

Additional provisions should be included to ensure viability concerns can be fully considered on a site by site basis, if need be. This would allow flexibility to be applied in select circumstances on both tenure and in the percentage applied to ensure the delivery of much need market and affordable housing is not unintentionally undermined.



#### Sapphire Land (0247)

Supportive of principle of providing affordable housing but consider applying a fixed affordable housing rate of 35% is not appropriate for all sites. Requirement does not account for sites with viability challenges which are likely to be exaggerated brownfield approach and will result in marginal housing sites remaining undeveloped, putting significant development pressure on other, less marginal sites - for example in the green belt in direct contradiction to the spatial strategy. Will stifle any development prospects at Western Harbour. Not appropriate to apply any fixed requirement for affordable housing and this should be discussed on a site-by-site basis subject to viability considerations. Flexibility in affordable housing provision for long term vacant sites which are faced with significant viability challenges should be incorporated within the policy.

#### Scottish Property Federation (0144)

Seek a change to the minimum affordable housing target because we feel it will be unachievable for many development projects and will therefore conflict with other policy aspirations. This could include a failure to support much needed new purpose built student accommodation, new forms of residential investment that could support the creation of new communities, such as build-to-rent, and to meet the needs of 'last-mile' logistics and distribution to support the city economy.

Requirement for a 35% will make some forms of development unviable and will be an obstacle to much needed investment in the purpose built student accommodation sector and the build-to-rent sector. There needs to be greater flexibility with this requirement, otherwise development may simply become unviable. Propose that 35% is an aspiration, flexed to adapt to different projects and not a minimum requirement.

Requirement for commercial developments above 0.25ha. to support affordable housing should be dropped. Prefer requirement for affordable housing to be on a selected basis, in discussion with potential commercial developers where the council believes there is a viable case for affordable housing contributions.

#### Southside Community Council (0781)

Supports the setting of a minimum affordable housing requirement on 35% - in some cases if the aim of addressing inequality and poverty is to be met, much higher percentages of affordable homes will need to be stipulated. Given the housing affordability crisis that exists in Edinburgh suggests that in terms of meeting the aims of the Strategy/Outcomes– a level of 40% would be more appropriate.

Request a strong statement in the policy text or narrative that any applications to reduce affordable housing requirements will be dismissed and more clarity of the definition of affordable housing.

#### Suzanne McIntosh (0409)

35% makes many sites unviable and does not assist the end goals of the plan. The Plan provides opportunity to ensure a brownfield first approach and re-use of land, often with significant demolition/ land restoration/ contamination costs. A blanket requirement for

affordable housing does nothing to assist the sequential approach. The sites that are edge of city, greenfield, often green belt type allocations should reasonably contribute more given significantly more is being lost in terms of the land around the city enjoyed for the public benefit.

Taylor Wimpey and Hallam Land Management Ltd (0603)

Support the Council's aspirations of delivering more affordable but express caution over the proposed change to 35%. Needs to be balance between encouraging affordable housing and not prohibiting market housing coming forward. Increasing the required provision of affordable housing without consideration of viability could impact on delivery.

Council has not planned to meet the housing need and demand identified in its own evidence base and this constrained supply of housing has impacted upon the affordability of housing in general. Consider first step to reducing affordability and increasing affordable housing delivery to be to increase delivery of all tenures which requires allocation of effective sites. The combination of a brownfield only approach and a 35% threshold will have an adverse impact on housing delivery.

Should consider the cumulative impact of increasing the financial burden on homebuilders from contributions sought in other policy areas.

Telereal Trillium (0540)

Consider blanket affordable housing policy across the whole city to be punitive when there are critical urban brown field sites which will be subject to viability stresses. Refer to work with other planning authority where 100% waiver was the sole reason for the site progressing.

Suggests a change to allow specific viability delivery cases to be made.

The Stoddart Family (0749)

Support the position of Homes for Scotland in terms of their objections raised to the proposed plan.

Union Property Services Ltd/VRS Ltd (0584), Ryden LLP (0578)

Affordable housing should continue to include a range and mix of tenures, 35% should be aspiration, viability based on land currently being transacted on assumptions of affordable provision at 25% should be recognised. Lead in time will be needed where detailed appraisals are required to assess the impact of such a significant change on potential land values and full costs of demolition, land remediation and redevelopment. To ease that transition a range of potential affordable tenures should be included to allow a blended approach to delivery.

Different forms of acceptable tenure require to be explicitly stated within the policy and need to be flexibly applied to ensure delivery based on viable economics of development.

University of Edinburgh (0464)

Increase in affordable housing requirement places additional pressure on land values and delivery of housing numbers. Do not wish to provide detailed comment on the wider debate around housing delivery however implications of a successful housing market have a direct influence on the future success of the University. The ability to attract and retain staff, researchers, and certain cohorts of the student population is directly influenced by the ability to access suitable housing options. In future, if the housing market dictates that there is a need for the University to intervene and provide selected housing offerings to meet wider staff and student need, this may be an area that requires to be factored into the delivery of university facilities. In such cases, it would need to be acknowledged that any provision would be specifically to meet University requirements and be controlled as such through suitable restrictions and would not be considered as general market housing. Consequently, the University of Edinburgh would not expect to be required to provide affordable housing as part of any proposal, as this would further impact on the viability and deliverability of product where this is deemed to be required.

#### Watkin Jones Group (0516)

Consider that 35% on-site affordable housing may have an adverse impact on development viability. Due to already high land values in the city, the affordable housing requirements should remain at 25% or lower for urban and brownfield sites, and the higher percentage requirements should be on greenfield sites only. Approach makes it more attractive for developers to build on brownfield sites which are often constrained and pose a number of other issues which need to be addressed.

There should be flexibility in tenures and definitions of affordable housing, and viability should be a consideration. Particularly pertinent for Build to Rent projects.

#### BDW Trading (0350), Stewart Milne Homes (0118), Taylor Wimpey (0200)

The policy is not consistent with national policy nor is it supported by available evidence. A clear national policy contributes positively, providing a predictable environment for investment. A movement away from this with differences between authorities adds complexities and potential distortions to the housing market.

Considers that the Council has withheld the evidence it claims supports this policy. Understand there are important inconsistencies between the actual evidence and the way it is described in the Housing Technical Note. Have concerns about the status District Valuers report and its availability.

It is not clear the extent to which the draft District Valuers Report or the Council has considered the 35% in the context of the viability considerations outlined in the Edinburgh Commercial Needs Study.

Should amend to a 25% affordable housing requirement, aligning with national policy.

The policy should not be overly prescriptive on the types of affordable tenure permitted to enable flexibility over time and changes in funding to be adapted to.

**Modifications sought by those submitting representations:**

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695), HUB Residential (0582)

Amend requirement to 25% and recognise all forms of affordable housing tenure.

Acknowledge in policy that Build to Rent operates a different model to traditional housing for sale, therefore a specific approach to affordable housing is necessary.

Affordable housing offer should be entirely Discounted Market Rent and managed by the Build to Rent provider to enable Discount Market Rent units to be fully integrated into the development.

Affordable Housing consultant, JLA (0756)

Request that Council review and consult on affordable housing guidance to support the policy.

AREAA (0358)

Reword policy to read:

“Developments including conversions, consisting of 12 or more units are required to provide affordable housing amounting to at least 25 % and upwards to 35% of the total number of units proposed, subject to a viability assessment. The provision should normally be on site. Tenure should be consistent with local housing need”.

Astley Ainslie Community Engagement Group (AACEG) (0275)

Replace “The provision should normally be on site.” with “The provision should be on site except in exceptional circumstances. “

Barratt David Wilson Homes (0677), Dandara East Scotland (0757), Steve Loomes (0767), Wright PDL (0078)

Support Homes for Scotland recommendations

BDW Trading (0350), J. Smart & Co. (Contractors) PLC (0483), Stewart Milne Homes (0118), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603)

Amend affordable housing requirement to 25%

CALA Management Ltd (0465), Hallam Land Management (0599)

Amend policy to:

Developments including conversions, consisting of 12 or more units are required to provide affordable housing amounting to no more than 25% of the total number of units proposed. The provision should normally be on site. Tenure should be consistent with local housing need.

Cockburn Association (0777)

Remove text from para 3.178 "or as far as".

Crosslane Co-Living SPV 2 Limited (0687)

Infers policy should require a financial contribution for serviced-residential living developments.

Crosswind Developments Ltd (0184)

Amend policy as follows:

"Developments including conversions, consisting of 12 or more units are required to provide affordable housing amounting to at least 25 % and upwards to 35% of the total number of units proposed, subject to a viability assessment. The provision should normally be on site. Tenure should be consistent with local housing need".

Defence Infrastructure Organisation (0124)

Add sentence to paragraph 3.178 of the proposed plan to explain that exceptions and flexibility in the application of policy Hou 2 will be considered on a case by case basis where justified by exceptional circumstances, for example, where a development contains exceptional costs that would make 35% affordable housing on-site unviable.

Dunedin Canmore Housing Limited (0766)

No change proposed

Edinburgh Dog and Cat Home (0310)

Amend Policy Hou 2 to:

"Developments including conversions, consisting of 12 or more units are required to provide affordable housing amounting to 25% of the total number of units proposed taking into account the viability of the proposed development. Tenure should be consistent with local housing need."

Edinburgh Poverty Commission (0717)

Clarify priorities and greatest needs in terms of affordable and social housing.

Edinburgh World Heritage (0339)

Amend policy wording to:

"...provision should normally be on site and weighted to support the diversity and cultural resilience required locally"

Elaine Sosinka (0721)

No modification is specified but the representation implies that affordable housing should be social rent and should be provided on site.

Grange/Prestonfield Community Council (0192)

Delete “normally” from policy.

Hallam Land Management (0615), Tarmac (0244)

Provide additional detail on analysis and justification.

Alter threshold to a higher figure on larger sites in a progressive way.

Introduce a new clause that ‘On sites of 200 or more units the level of provision may be varied in accordance with local housing needs and the prospects for delivery within the Plan period.’

Homes for Scotland (0404), The Stoddart Family (0749)

Mix of affordable housing required should be reviewed, and where it can be evidenced that viability issues may exist, or where need for types of properties are evident, the split should be assessed.

James Forbes (0647)

Infers that policy should not allow for commuted sums.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Assessment of the cumulative total of developments planned by a developer (including those of fewer than 12 units) should be undertaken to avoid submission of multiple applications for fewer units.

Resist practice of commuted sums.

KR Developments Group Limited (0263)

Exclude build to rent from 35% requirement and provide for a more flexible approach which considers each proposal on its own merits based on the locational and specific demand dynamics.

Lady Road Investment S.A.R.L. (0625), Tiger Developments Ltd (0602), Arnold Clark Automobiles Ltd (0750)

Remove requirement for 35 % affordable housing and require applicants to consult with and deliver what social housing providers need in terms of the provision and mix of tenures and units to be delivered.

LPBZ Commercial Ltd (0391)

Amend policy to require 25% affordable requirement

Present additional 10% in policy as an option for developers which can provide them with a financial return, such as unsubsidized Low-Cost Home Ownership or the 10% use to provide housing for older people.

Lynn Grattage (0362)

Sites should provide 70% affordable housing

Leith Central Community Council (0614)

Require 50% social housing in Leith.

Require affordable housing contribution in LCCC area primarily for rent.

Include definition of affordable housing as a ratio of the National Living Wage.

Amend policy requirement to a minimum of 35% of total habitable space.

Leith Harbour and Newhaven Community Council (0776)

No change specified however comments infer that social housing should not be segregated from market housing.

Mark Ockendon (0419)

At 2.2(6): remove "and securing a minimum 35% affordable housing contribution from new developments in Edinburgh."

At 2.92 remove "and a requirement for market housing developments to deliver a proportion of their units for affordable housing."

At 2.92 remove "and requires that market sites provide 35% of their units to deliver affordable housing in mixed use sustainable communities"

Melford Developments Ltd (0308)

Set threshold of 20 units and a requirement of 30% on brownfield sites with 35% (maximum) on greenfield sites of over 50 units.

Morag MacLean (0326)

More emphasis on social housing, rather than affordable housing.

New Town & Broughton Community Council (0254)

Retain 25% requirement but include, either on-site or, if justified, at a nearby city centre location, a significant percentage of this being truly affordable housing.

NHS Lothian (0596)

No modification specified.

Nicola McCowan Hill (0195)

25% maximum with the policy being flexible to deal with viability of sites.

Parabola Edinburgh Limited (0723)

Infers that requirement should be 25%.

Peter Allen (0336)

Include reference to community-led collective custom build throughout the plan

Set aside land for community-led collective custom build.

Robertson Residential Group (0537)

Amend policy to require 25% affordable requirement.

Amend Paragraph 2.92 on page. 26 to:

‘There is a very significant all tenure housing need across Edinburgh. Affordable housing in Edinburgh is delivered directly through the Council’s affordable housing programme and a requirement for market housing developments to deliver a proportion of their units for affordable housing. City Plan aims to increase the amount new homes that are affordable and requires that market sites provide a minimum 25% of their units to deliver affordable housing in mixed use sustainable communities.’

Amended aim 6 to read:

‘Delivering land to meet Edinburgh’s housing needs over the next decade and securing a minimum 25% affordable housing contribution from new developments in Edinburgh.’

Rosebery Estate (Bankhead) (0618)

Change supporting text to:

“This policy will be applied to all developments of 12 or more residential units allocated in this Plan. It does not apply to student accommodation or to housing sites carried forward from the LDP”.

SAICA (0590), Nuveen Real Estate (0564), Nuveen Real Estate (0734), CBRE Global Investors (0644)

Include additional provisions to ensure viability concerns can be fully considered on a site by site basis, if need be.

Sapphire Land (0247)



Amend policy to state that for sites which are subject to significant viability challenges, a reduction in affordable housing provision could be negotiated, subject to sufficient viability information being submitted to the Council.

Scottish Property Federation (0144)

Amend policy to state that 35% is an aspiration, flexed to adapt to different projects and is not a minimum requirement.

Remove requirement for developments above 0.25ha. to support affordable housing.

Spire Healthcare Limited (0719)

Amend policy to:

“Developments including conversions, consisting of 12 or more units are required to provide affordable housing amounting to 25% of the total number of units proposed. The provision should normally be on site. Tenure should be consistent with local housing need.”

Amended aim 6 to read:

“Delivering land to meet Edinburgh’s housing needs over the next decade and securing a 25% affordable housing contribution from new developments in Edinburgh.”

Amend paragraph 2.92 to state 25%.

Southside Community Council (0781)

Infers that policy should require 40% affordable housing

Include a statement in the policy text and/or surrounding narrative that any applications to reduce affordable housing requirements will be dismissed and more clarity of the definition of affordable housing.

Suzanne McIntosh (0409)

Require a lower percentage requirement on windfall sites and a higher percentage requirement on allocated sites.

Telereal Trillium (0540)

Amended requirement to 25%.

Add paragraph after 3.178:

“Whilst the above policy sets the benchmark for all housing sites with the aspiration for a higher quota of affordable housing, some of the allocated housing sites will involve more challenged brownfield land with historic infrastructure, remediation or viability and delivery issues. Policy Hou2 will be applied with an allowance for planning applications to be accompanied by a report of evidence on viability and delivery challenges and an

acceptance that some sites, where evidence is demonstrated, will be allowed relaxations on the normal requirements for affordable housing contributions.”

University of Edinburgh (0464)

Infers that provision of housing by universities should be excluded from the affordable housing requirement

Union Property Services Ltd/VRS Ltd (0584), Ryden LLP (0578)

Add wording is required to recognise that viability of redevelopment of land currently being transacted on assumptions of affordable provision at 25% should be taken into account. In such cases a range of potential affordable tenures should be included in policy reference so that a blended approach to delivery of affordable housing can be taken.

Watkin Jones Group ((0516)

Requirement should be 25% or lower for urban and brownfield sites, and a higher percentage requirement should be on greenfield sites only.

**Summary of responses (including reasons) by planning authority:**

**General**

Archie Clark (0003)

Policy Hou 5 Conversion to Housing supports change of use of existing buildings in non-residential use to housing which would allow for the conversion of student housing to residential use. Policy Hou 2 Affordable Housing applies to conversions. **No modification proposed.**

Astley Ainslie Community Engagement Group (AACEG) (0275)

The use of the word normally implies that as a rule affordable housing provision should be on site. This is considered appropriate language. **No modification proposed.**

Cockburn Association (0777)

Paragraph 3.178 of the Plan states that ‘Given the scale of affordable housing need developments should support the delivery of new affordable homes as far as possible’. This acknowledges that there may be circumstances where this is not possible but that these would be exceptional. **No modification proposed.**

Crosslane Co-Living SPV 2 Limited (0687)

Policy Hou 2 requires that affordable housing provision should normally be on-site. This acknowledges that there may be circumstances where it is not possible for on-site provision therefore allows for a financial contribution. **No modification proposed.**

Edinburgh Poverty Commission (0717)

The priority for affordable housing and social rented housing is made clear in the plan. The Plan sets out requirements for affordable housing and defines this within paragraph 3.178. This also identifies that the highest housing need is for homes delivered for social rent. Further guidance on affordable housing tenure is set out in non-statutory Affordable Housing Guidance (CD053) as referred to in paragraph 3.178 of the plan. This sets out an expectation that 70% of affordable housing provision on each site be for social rent. **No modification proposed.**

Edinburgh World Heritage (0339)

It is not considered necessary for Policy Hou 2 to be weighted to support the diversity and cultural resilience required locally. The need for affordable housing is city wide. **No modification proposed.**

Elaine Sosinka (0721)

Policy Hou 2 requires that provision is normally on site. Paragraph 3.178 of the Plan states that the highest housing need in the city is for homes delivered for social rent. It encourages early engagement with a Registered Social Landlord. Further guidance on affordable housing tenure is set out in non-statutory Affordable Housing Guidance (CD053) as referred to in paragraph 3.178 of the plan. This sets out an expectation that 70% of affordable housing provision on each site be for social rent across the city. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

Policy Hou 2 requires that provision is normally on site. The use of the word normally acknowledges that there may be circumstances where this is not possible but that these would be exceptional. Non-statutory Affordable Housing Guidance (CD053) sets out criteria. It is not considered necessary to remove the word 'normally'. **No modification proposed.**

James Forbes (0647)

Policy Hou 2 requires that developments including conversions, consisting of 12 or more units provide affordable housing and that provision should normally be on-site. Commuted sums are not addressed within the proposed plan. Non-statutory Affordable Housing Guidance (CD053) sets out the approach which accepts commuted sums only in exceptional circumstances. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Policy Hou 2 requires that developments, including conversions, consisting of 12 or more units are required to provide affordable housing amounting to 35% of the total number of units proposed and that provision should normally be on site. Further information on the application of the policy is set out in non-statutory Affordable Housing Guidance (CD053) as referred to in paragraph 3.178 of the plan. Guidance states that where a proposal is fewer than 12 units but is clearly part of a phased development of a larger site which would be subject to an affordable housing requirement, an affordable element will be required at an appropriate stage in the development of the site as a whole.

Commuted sums are not addressed within the proposed plan. non-statutory Affordable Housing Guidance (CD053) sets out the approach which accepts commuted sums only in exceptional circumstances. **No modification proposed.**

Leith Central Community Council (0614)

It is suggested that the definition of affordable housing should be based upon a ratio of the national living wage. It is considered that the definition provided within the glossary is acceptable as it describes affordable housing as meeting the needs of people who cannot afford to buy or rent housing available on the open market and reflects the definition provided in SPP 2014. **No modification proposed.**

Paragraph 3.178 of the Plan states that the highest housing need in the city is for homes delivered for social rent. It encourages early engagement with a Registered Social Landlord. Further guidance on affordable housing tenure is set out in non-statutory Affordable Housing Guidance (CD053) as referred to in para 3.178. This sets out an expectation that 70% of affordable housing provision on each site be for social rent across the city. **No modification proposed.**

It would not be appropriate to set a target for the Leith Community Council area that requires affordable housing to be for rent only. This would not be in line with the approved affordable housing tenures which include low cost home ownership. Council guidance sets out approved tenures ranked by priority and requires that applicants in the first instance identify how their proposals have been designed to allow for on-site delivery by an RSL in the first instance. **No modification proposed.**

Policy Hou 2 requires that developments, including conversions, consisting of 12 or more units are required to provide affordable housing amounting to 35% of the total number of units proposed and that provision should normally be on site. Policy acknowledges that there may be circumstances in which it is not possible to provide affordable housing on site. The exceptional circumstances are set out in non-statutory Affordable Housing Guidance (CD053).

SPP 2014 (CD096) sets out that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. It does not require it to be 25% of habitable space. **No Modification Proposed**

Leith Harbour and Newhaven Community Council (0776)

Policy Hou 2 requires that provision of affordable housing should normally be on site. Integration of social rented housing is addressed in non-statutory Affordable Housing Guidance (CD053) which includes avoiding large groupings of the same tenure type and that no more than 0.5Ha of social rented housing should be located together. **No modification proposed.**

Mark Ockendon (0419)

The greatest need is for affordable housing. Delivery of affordable housing is largely determined by availability of funding. Delivery of affordable housing is, therefore, also dependent to a significant extent upon private sector housing delivery and the affordable housing policy of the development plan. To deliver the affordable housing target it is necessary to require a proportion of market sites to deliver affordable housing as part of

the development. It is therefore appropriate to include the reference to the 35% affordable housing contribution from new developments in Edinburgh within the Aims set out at 2.2 of the Plan and the outcomes at paragraph 2.92. **No modification proposed.**

Morag MacLean (0326)

Paragraph 1.4 of the Plan sets out a commitment to building 20,000 affordable and low cost homes. Affordable housing is defined as housing that is for sale or rent, to meet the identified needs of people who cannot afford to buy or rent housing generally available on the open market. It includes social housing. Paragraph 3.178 of the Plan states that the highest housing need in the city is for homes delivered for social rent. It encourages early engagement with a Registered Social Landlord. Further guidance on affordable housing tenure is set out in non-statutory Affordable Housing Guidance (CD053) as referred to in paragraph 3.178 of the plan. This sets out an expectation that 70% of affordable housing provision on each site be for social rent. It is considered that there is appropriate emphasis on social rent. **No modification proposed.**

New Town & Broughton Community Council (0254)

Policy Hou 2 requires that provision under the policy should normally be on-site. Policy acknowledges that there may be circumstances in which it is not possible to provide affordable housing on-site. The exceptional circumstances are set out in non-statutory Affordable Housing Guidance (CD053). The Affordable Housing Guidance is subject to regular review. **No modification proposed.**

Peter Allen (0336)

While the Council acknowledge that community-led collective custom build can play a role in delivering affordable housing it does not consider it necessary to refer to one specific type of delivery within paragraph 2.92. Part 4, Table 2 Housing proposals and the proposals map identifies allocated housing sites where development for housing is supported by Policy Hou 1. In addition, Hou 1 supports housing on other sites within the urban area. It is not considered necessary to allocate specific sites for community-led custom build. **No modification proposed.**

University of Edinburgh (0464)

Policy Hou 1 applies to housing development. The nature of university provided housing for staff would be considered on a case by case basis through the planning application process which takes into account other material considerations. **No modification proposed.**

### **Definition of Affordable Housing**

Arnold Clark Automobiles Ltd (0750), Lady Road Investment S.A.R.L. (0625), LPBZ Commercial Ltd (0391), New Town & Broughton Community Council (0254), Parabola Edinburgh Limited (0723), Southside Community Council (0781), Tiger Developments Ltd (0602), Watkin Jones Group (0516)

The definition of affordable housing is set out in the Glossary. It is considered that the definition provided is acceptable as it describes affordable housing as meeting the needs

of people who cannot afford to buy or rent housing available on the open market and reflects the definition provided in SPP 2014 (CD096).

Policy Hou 2 does not define the affordable housing tenures. These are set out in non-statutory Affordable Housing Guidance (CD053). The guidance sets out a range of tenures in line with PAN 2/2010 (CD118). Sufficient flexibility in tenures is provided within this approved range. It is not appropriate to distinguish between these within the Plan as these will be determined at application stage ensuring that proposed developments meet an affordable housing need at the point where planning consent is issued.

Paragraph 3.178 of the Plan states that the highest housing need in the city is for homes delivered for social rent. It encourages early engagement with a Registered Social Landlord. Council guidance sets out an expectation that 70% of affordable housing provision on each site be for social rent across the city. **No modification proposed.**

### **35% Requirement for Affordable Housing**

Ambassador Group (0683), AREAA (0358), Barratt David Wilson Homes (0677), BDW Trading (0350), CALA Management Ltd (0465), Crosslane Co-Living SPV 2 Limited (0687), Crosswind Developments Ltd (0184), Dandara East Scotland (0757), Hallam Land Management (0599), Hallam Land Management (0615), Hazledene House Limited (0695), Homes for Scotland (0404), HUB Residential (0582), J. Smart & Co. (Contractors) PLC (0483), LPBZ Commercial Ltd (0391), Nicola McCowan Hill (0195), Parabola Edinburgh Limited (0723), Robertson Residential Group (0537), Sapphire Land (0247), Spire Healthcare Limited (0719), Steve Loomes (0767), Stewart Milne Homes (0118), Tarmac (0244), Taylor Wimpey (0200), Taylor Wimpey and Hallam Land Management Ltd (0603), Telereal Trillium (0540), The Stoddart Family (0749), Watkin Jones Group (0516) Wright PDL (0078)

SPP 2014 (CD096) paragraph 129 states that plans should identify any expected developer contributions towards delivery of affordable housing. Where a contribution is required, this should generally be for a specified proportion of the serviced land within a development site to be made available for affordable housing. Planning authorities should consider the level of affordable housing contribution which is likely to be deliverable in the current economic climate, as part of a viable housing development. The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. No maximum level is specified. Draft NPF4 (CD099) requires that at least 25% of the total number of homes is affordable and a higher contribution may be sought where there is evidence of need.

It is acknowledged that the need for affordable housing must be balanced with the viability of developers to provide this. The Council commissioned the District Valuer in 2019 to model the impact of changes to affordable housing policy on development viability in Edinburgh. To demonstrate a correlation between the affordable housing percentage requirement and the existing use value / alternative use value of existing brownfield sites, the impact on value of an actual sample brownfield site which could, in the medium term, be brought forward for redevelopment purposes was examined, assuming both redevelopment for existing use and redevelopment for residential use. The exercise suggests that land values in Edinburgh are high enough to justify an affordable housing

requirement above 25%. Based upon this, Choices for City Plan 2030 (CD022) set an affordable housing requirement of 35%. This reflects that the greatest need is for affordable housing.

Comments received during the Choices consultation were considered. Comments were summarised and reported to Planning Committee on 12 August 2020 (CD038). Following the Choices consultation, a review of the 35% requirement was carried out which concluded that the correlation between land value and the level of affordable housing provision that can potentially be sustained is broadly the same as that identified in 2019 which influenced Choices. Based upon this, and that the greatest need is for affordable housing City Plan 2030 maintains an affordable housing requirement of 35%.

The report provided by the District Valuer is not a public document. It was prepared by the DVS who are regulated in terms of disclosure of information. In response to a Freedom of Information request a redacted copy of the report was provided. The extent of the redaction to protect confidentiality is such that part of the analysis and the entirety of the conclusion has been removed. Given the value of the report in this form to the public it has not been made publicly available as a matter of course. Section 3 of the City Plan Housing Technical Report (CD018) sets out the scope and conclusions from the report. Delivery of affordable housing is dealt with under Issue 20: Assessment of Housing Land Supply.

The policy sets out requirements. Any exception to this will be considered through the planning application process. Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101), allows for material considerations, including viability, to be considered on a case-by-case basis. Sites and proposals vary in nature and not all policies of the development plan will be applicable to each proposal. The requirements of the development plan should be taken into account in negotiations. **No modification proposed.**

A threshold of 12 or more units is an established local development plan policy. Increasing the threshold would reduce the amount of affordable housing provided which would not be appropriate given that the greatest need is for affordable housing. **No modification proposed.**

It is not considered necessary to have a different requirement for brownfield and greenfield land or for different size of sites. Both types of land and a range of site sizes have been considered in determining the 35% requirement set out in city plan. **No modification proposed.**

It is suggested by some representees that that the requirement should be 25% with a needs based assessment for an additional 10% and that this could focus on additional tenures beyond currently approved housing tenures. It is considered that the 35% affordable requirement is achievable and it provides a level of certainty for developers. **No modification proposed.**

Policy Hou 2 sets out the requirement for affordable housing provision. The Council's non-statutory Affordable Housing Guidance (CD053) provides detail. It is not necessary to refer to viability within the policy. The requirement has been set at a level that has been assessed as achievable and exceptions to this will be considered on a site by site basis

through the planning application process which takes account of other material considerations including viability. **No modification proposed.**

Given the level of need for affordable housing and limitations on funding there is a need to maximise the amount of affordable housing provided through the market. Where new applications are submitted it is considered acceptable and necessary that the affordable housing policy is applied as set out in City Plan 2030. The preferred option to increase the affordable housing requirement to 35% was set out in Choices for City Plan 2030 (CD022) which was published in January 2020. The time to adoption of City Plan provides a period of several years of awareness of the requirements and for these to be taken into account. The requirements of the development plan should be taken into account in negotiations. Any exception to this will be considered through the planning application process. Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101), allows for material considerations, including viability, to be considered on a case-by-case basis. **No modification proposed.**

Other local authorities have requirements above 25%, e.g., Stirling. It is considered to be widely understood that different authorities will have different policies in place and it is not accepted that a percentage other than 25% will lead to confusion. **No modification proposed.**

#### Affordable Housing consultant, JLA (0756)

Funding requirements are updated to Scottish Government annually through the Strategic Housing Investment Plan (SHIP) (CD057) and would include any additional grant funding required to deliver 35% affordable housing.

Grant rates for affordable housing have increased in the past year. Grant requirements for each local authority area are updated each year. There are unsubsidised affordable housing tenures which do not require any grant funding. The representation appears to assume that there would be a reduced grant rate but this is not happening in practice – a reduction in grant has not been proposed by the City of Edinburgh Council or Scottish Government. If further grant funding is required, this would be requested from Scottish Government.

The non-statutory Affordable Housing Guidance (CD053) is not out of date, having been last updated with minor changes in 2021 and is subject to regular review. The commuted sum policy is compliant with Planning Advice Note Pan 2/2010 (CD118), which sets out that “The decision to accept a commuted sum is one for the planning authority, and the rationale for accepting or rejecting a commuted sum should be set out clearly in local policy” and published guidance does set out the Council policy for commuted sums. That the Council’s policy differs only because PAN 2/2010 suggests that the planning authorities consider a local commuted sums policy. The Council’s Affordable Housing guidance has been effectively implemented, resulting in the delivery of thousands of affordable homes. **No modification proposed.**

#### Crosswind Developments Ltd (0184), CALA Management Ltd (0465), Hallam Land Management (0599)

It is not necessary to amend the wording of the policy to set an affordable housing requirement of 25% for the reasons set out above. The requirement has been set at a



level that has been assessed as generally achievable. Exceptions to this will be considered through the planning application process which allows for the consideration of other material considerations including viability. **No modification proposed.**

Defence Infrastructure Organisation (0124)

Policy Hou 2 sets out the requirement for affordable housing provision which includes conversions of existing buildings. The requirement has been set at a level that has been assessed as generally achievable and exceptions to this will be considered through the planning application process. **No modification proposed.**

Edinburgh Dog and Cat Home (0310)

The requirement of 35% has been set at a level that has been assessed as achievable. The requirements of the development plan should be taken into account in negotiations. Exceptions to this will be considered through the planning application process which takes account of material considerations including viability on a case by case basis. It is not considered necessary to include additional text to refer to viability or amend the text to require 25% affordable housing. **No modification proposed.**

Policy Hou 2 requires that affordable housing provision should 'normally' be on site. This acknowledges that there may be circumstances where it is not possible for on-site provision. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

The 35% requirement is considered appropriate for the reasons set out above. It is not considered necessary to introduce a new clause that 'On sites of 200 or more units the level of provision may be varied in accordance with local housing needs and the prospects for delivery within the Plan period.' The greatest need is for affordable housing, therefore it would not be appropriate for the policy to state any variance for larger sites. The requirement of 35% has been set at a level that has been assessed as achievable on sites of 12 or more units. Exceptions to this will be considered through the planning application process which takes account of material considerations on a case by case basis. **No modification proposed.**

A threshold of 12 or more units is an established local development plan policy. Increasing the threshold would reduce the amount of affordable housing provided which would not be appropriate given that the greatest need is for affordable housing. **No modification proposed.**

HUB Residential (0582), Hazledene House Limited (0695) Crosslane Co-Living SPV 2 Limited (0687), Ambassador Group (0683)

25% requirement is not supported for the reasons above. Build to rent developments are considered as a strand of mainstream housing therefore is considered appropriate that they meet with the affordable housing requirement. Policy Hou 2 requires provision of affordable housing. Council Guidance sets out approved tenures which are in line with those set out in PAN 2/2010 (CD118). This provides for a range of tenures and allows for delivery of on-site unsubsidised units. **No modification proposed.**

J. Smart & Co. (Contractors) PLC (0483)

The 35% requirement is considered appropriate for the reasons set out above.

Existing use values of land is likely to vary considerably. Many of the allocated sites have outdated buildings reaching the end of their life and will ultimately become obsolete. The value of older real estate and the income in perpetuity will therefore inevitably fall as it becomes obsolete, either in terms of its stock or its location and owners will be faced with the choice of investing in the real estate to replace the buildings or by selling the site to developers. It is for this reason that there has been long term trend for the redevelopment of old employment sites. Residential land values have historically been higher, particularly compared to dated industrial stock, and as a result the Council does not consider the sites existing use value to be prohibitive in bring forward housing development overall. **No modification proposed.**

KR Developments Group Limited (0263)

It is considered to be widely understood that different authorities will have different policies and it is not accepted that a percentage other than 25% will lead to confusion.

The requirement of 35% has been set at a level that has been assessed as achievable and along with other requirements of the Plan should be taken into account in negotiations. Sites and proposals vary in nature and not all policies of the development plan will be applicable to each proposal. Exceptions will be considered through the planning application process which takes account of material considerations including viability on a case by case basis.

Build to rent developments are considered as a strand of mainstream housing therefore is considered appropriate that they meet with the affordable housing requirement. **No modification proposed.**

Lady Road Investment S.A.R.L. (0625), Tiger Developments Ltd (0602), Arnold Clark Automobiles Ltd (0750)

Policy Hou 2 sets out the requirement for affordable housing provision. The non-statutory Affordable Housing Guidance (CD053) provides detail of the application of the policy. The requirement has been set at a level that has been assessed as achievable and exceptions to this will be considered through the planning application process. **No modification proposed.**

Paragraph 3.178 of the Plan states that early engagement should take place with a Registered Social Landlord when designing a scheme. Non-statutory Affordable Housing Guidance (CD053) sets out the tenure types ranked to reflect the housing needs of the city. It is not appropriate to distinguish between these within the Plan as these will be determined at application stage ensuring that proposed developments meet an affordable housing need at the point where planning consent is issued. **No modification proposed.**

LPBZ Commercial Ltd (0391)

SPP 2014 (CD096) sets out that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. It does not specify a maximum level. The 35% requirement is considered appropriate for

the reasons specified above. It is considered that the 35% affordable requirement is achievable, and it provides a level of certainty for developers. The Council does not support the suggestion that should the Council pursue the additional 10% affordable units, then this should be presented in policy as an option for developers which can provide them with a financial return, such as unsubsidized low-cost home ownership or to provide housing for older people. The Plan sets out the requirement and exceptions to this will be considered on a case by case basis through the planning application process which takes account of other material considerations. **No modification proposed.**

Lynn Grattage (0362)

Viability assessment suggest that 35% could be supported however there is no basis for an increase beyond this. **No modification proposed.**

Melford Developments Ltd (0308)

A threshold of 12 or more units is an established local development plan policy. Increasing the threshold would reduce the amount of affordable housing provided which would not be appropriate given that the greatest need is for affordable housing. Many allocations in City Plan are brownfield as are windfall sites. Reducing the requirement to 30% for brownfield sites would reduce the amount of affordable housing provided. The requirement has been set at a level that has been assessed as achievable and exceptions to this will be considered through the planning application process. **No modification proposed.**

Robertson Residential Group (0537)

There is no need to amend Paragraph 2.92 or Aim 6. The 35% requirement is considered to be appropriate for the reasons provided above. **No modification proposed.**

Rosebery Estate (Bankhead) (0618)

Proposed changes to policy text are not accepted. Given the level of need for affordable housing and limitations on funding there is a need to maximise the amount of affordable housing provided through the market. Where new applications are submitted it is considered acceptable and necessary that the affordable housing policy is applied as set out in City Plan 2030. The preferred option to increase the affordable housing requirement to 35% was set out in Choices for City Plan 2030 (CD022) which was published in January 2020. The time to adoption of City Plan provides a period of several years of awareness of the requirements and for these to be taken into account. **No modification proposed.**

SAICA (0590), Nuveen Real Estate (0564), Nuveen Real Estate (0734), CBRE Global Investors (0644)

Policy Hou 2 sets out the requirement for affordable housing provision. Other material considerations will be taken into account in determining any applications. The Council's non-statutory Affordable Housing Guidance (CD053) provides detail. It is not necessary to refer to viability within the policy. The requirement has been set at a level that has been assessed as achievable and exceptions to this will be considered through the planning application process. **No modification proposed.**

Sapphire Land (0247)

It is not necessary to amend the policy as suggested. The 35% requirement on all sites is considered appropriate for the reasons given above. Exceptions to policy can be considered through the planning application process which considers other material considerations including viability. **No modification proposed.**

Scottish Property Federation (0144)

Policy Hou 2 sets out the requirement for affordable housing provision. Build to rent developments are considered as a strand of mainstream housing therefore is considered appropriate that they meet with the affordable housing requirement. The requirement has been set at a level that has been assessed as generally achievable and exceptions to this will be considered through the planning application process. Student accommodation is supported in Policy Hou 6 and addressed under Issue 25 Student Accommodation. **No modification proposed.**

Policy Econ 2 Commercial development requires that proposals for commercial uses within the urban area on site 0.25ha or larger, should where compatible and appropriate with the site context, provide at least 50% of the site for housing. This policy supports the approach of the Plan to create sustainable communities, maximise opportunities for housing and avoid large mono use developments. The greatest need in Edinburgh is for affordable housing. It is therefore considered reasonable that where the development is for 12 or more units that it should contribute to the provision of affordable housing. Policy Econ 2 is covered under Issue 36 Commercial Development **No modification proposed.**

Southside Community Council (0781)

Whilst the greatest need for is for affordable housing this needs to be balanced with the viability of developers to provide this. Viability assessment suggest that 35% could be supported however there is no basis for an increase to the 40% suggested. **No modification proposed.**

Spire Healthcare Limited (0719)

It is not considered necessary to amend the text of the policy, aim 6 or paragraph 2.92 as suggested. The 35% requirement is considered appropriate for the reasons set out above. Exceptions to policy can be considered through the planning application process which considers other material considerations including viability. **No modification proposed.**

Suzanne McIntosh (0409)

Allocated sites include both greenfield legacy sites and brownfield sites. A higher percentage requirement on allocated sites could impact negatively on the delivery of allocated sites in preference to windfall sites with a lower requirement. The greatest need is for affordable housing. Windfall sites can contribute to meeting this need and to providing sustainable mixed communities. **No modification proposed.**

Taylor Wimpey and Hallam Land Management Ltd (0603)

25% requirement is not supported for the reasons above. The Plan meets the requirement for market housing in full. More than sufficient sites which includes a mix of brownfield and greenfield have been allocated to meet the housing land requirement. This

is addressed at Issue 20 Assessment of Housing Land Supply. Not all contributions sought in other policy areas will be applicable to every site. **No modification proposed.**

Telereal Trillium (0540)

It is not considered necessary to add the suggested paragraph after 3.178. The 35% requirement on all sites is considered appropriate for the reasons given above. Exceptions to policy can be considered through the planning application process which considers other material considerations including viability. **No modification proposed.**

Union Property Services Ltd/VRS Ltd (0584), Ryden LLP (0578)

The requirement has been set at a level that has been assessed as achievable and exceptions to this will be considered through the planning application process. Given the level of need for affordable housing and limitations on funding there is a need to maximise the amount of affordable housing provided through the market. Where new applications are submitted it is considered acceptable and necessary that the affordable housing policy is applied as set out in City Plan 2030. The preferred option to increase the affordable housing requirement to 35% was set out in Choices for City Plan 2030 (CD022) which was published in January 2020. The time to adoption of City Plan provides a period of several years of awareness of the requirements and for these to be taken into account.

There is a broad range of affordable housing tenures which are contained in Scottish Government Circular PAN 2/2010 (CD118) paragraph 5. The current approved tenures are set out in Council Guidance which allows for tenure type to be updated to reflect any change in Scottish Government Guidance.

The precise tenure mix will be determined at the point of application which allows for viability, financial and deliverability considerations to be fully taken into account. It not considered necessary to specify the approved tenures within the Plan. **No modification proposed.**

Watkin Jones Group (0516)

The requirement of 35% has been set at a level that has been assessed as achievable and exceptions to this will be considered through the planning application process. **No modification proposed.**

It is not considered necessary to have a different requirement for brownfield and greenfield land or for different size of sites. Both types of land and a range of site sizes have been considered in determining the 35% requirement set out in city plan. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 24	Mixed Communities	
Development plan reference:	Part 3: Policies - p 121, Policy Hou 3 Mixed Communities	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Ambassador Group (0683) AREAA (0358) BDW Trading (0350) CALA Management Ltd (0465) Colin and Emma Auld (0021) CoMoUK (0728) Crosslane Co-Living SPV 2 Limited (0687) Crosslane Group (0356) Crosswind Developments Ltd (0184) Dandara East Scotland (0757) Edinburgh Access Panel (0611) Hallam Land Management (0457) Hallam Land Management (0599) Hallam Land Management (0615) Hazledene House Limited (0695) Homes for Scotland (0404) HUB Residential (0582) Janet Woolley (0470) KR Developments Group Limited (0263) Leith Harbour and Newhaven Community Council (0776)</div> <div>Melford Developments Ltd (0308) Miller Homes Limited (0649) Mr T Klan (0307) Peter Allen (0336) Robertson Residential Group (0537) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) Scottish Property Federation (0144) Spire Healthcare (0719) Steve Loomes (0767) Stewart Milne Homes (0118) Stirling Developments Limited (0303) Tarmac (0244) Taylor Wimpey and Hallam Land Management Ltd (0603) Watkin Jones Group (0516) West Town Edinburgh Ltd (0660) Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	Policy Hou 3 sets requirements to deliver a range and mix of housing.	
Planning authority's summary of the representation(s):		
<div><u>Robertson Residential Group (0537), Hallam Land Management (0457) -Support</u>  Support policy and recognises the need for the delivery of a mixture of housing types, including larger family homes.  <u>West Town Edinburgh Ltd (0660)</u>  Support policy.  <u>Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695), HUB Residential (0582)</u></div>		

Consider approach to be overly prescriptive as a mix of house types and sizes, cannot be readily applied to the serviced residential living model, which in itself is addressing a particular need within the housing market. Size and type of housing will depend on the site's location and context.

Should be acknowledged that build to rent and serviced residential living operates a different model to traditional housing for sale, therefore a specific approach to affordable housing is necessary.

#### AREAA (0358)

A requirement to apply policy on small sites will render some developments undeliverable. Certain sub-sectors and tenures of the housing market require certain economies of scale to make developments viable and to maximise efficiency. Examples include housing for older people with extra care, RSL managed affordable housing and student housing. Similarly, market housing on certain windfall sites may be unable to accommodate multiple house types within parameters set by other policies.

BDW Trading (0350), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Stewart Milne Homes (0118), Taylor Wimpey (0200), Wright PDL (0078)

Would like further information on the definition of a larger family, the type of housing the Council considers suitable for family housing and why just 20% of new homes being for larger families is considered to be enough.

CALA Management Ltd (0465), Miller Homes Limited (0649) Hallam Land Management (0599)

Plan provides no clarity on why only a minimum of 20% of units suitable for larger families or clarification on the type of housing the Council considers suitable for family housing. Suggest a minimum of 30% of units suitable for larger families is provided. Otherwise, it may be appropriate to delete Hou 3 (b) entirely.

#### Colin and Emma Auld (0021)

Supportive of new housing however, feel the specific needs of families have not been considered. Many of the allocated sites in the Plan appear to have been unbuilt sites carried over from previous plans, which brings into question how the desired number of houses will really be achieved. Ask that the Plan be broadened to include more houses suitable for families with children (3, 4, 5 + bedrooms with gardens) and, in particular, for the sites in desirable areas in the south/south west of the city to be considered for inclusion.

#### CoMoUK (0728)

Incorporate shared transport solutions within new developments in mixed communities' policy to address the issues around transport poverty in areas of the Scottish Index Multiple Deprivations.

#### Crosslane Group (0356)

Potential co-living developments have not been taken into consideration. Summary of build to rent does not acknowledge that co-living is a concept of its own and policy must recognise this. The Edinburgh Design Guidance does not sufficiently address co-living and therefore the Plan should identify that co-living schemes meet a specific housing need and should be assessed differently. Consider that greater flexibility is required within the Plan to cater for co-living schemes so ensuring that it meets the tests set out within SPP.

Crosswind Developments Ltd (0184)

Supportive of the policy in general however seek an amendment for greater flexibility as a mix of house types or sizes may not always be possible, or suitable. Question viability of for a minimum of 20% of units suitable for large families, in addition to the other density requirements of the proposed plan.

Edinburgh Access Panel (0611)

Consider reference to a balanced mix including older people and special needs is too vague. There needs to be a specified proportion for the provision of accessible housing for developments of over 10 or 12 units and these should not be limited to the affordable sector and should apply to all private developer projects.

There is a shortage of appropriate accessible housing (to Housing for Varying Needs or BS9266-2013 standards) being provided and failure to address this could be taken as a failure of the Council to carry out its duties under the Equalities Act 2010.

Without a specific policy on accessible housing provision non-provision is not a planning matter and consider this to be an unacceptable situation that must be addressed to comply with the Council's responsibilities under the Equalities Act 2010.

Hallam Land Management (0615), Mr T Klan (0307), Tarmac (0244),

Consider there is no need for Hou 3 (a) which just restricts development and should not be basis for planning decisions. Suggests aspiration could be referred to in supporting policy text but should not be a requirement of policy.

Each site or phase of development should be treated in its own merits and be demand and market led. Applying a specified percentage may be a constraint on delivery or infrastructure particularly where a different mix is justified. Higher density more compact flatted developments at minimum standards required may not be appropriate environments for larger families in terms of garden and recreational space.

Hallam Land Management (0615), Mr T Klan (0307)

Policy should be relaxed where alternative provision for elderly or retirement living is provided in conjunction with mainstream market and affordable housing'

KR Developments Group Limited (0263)

Need for 20% of the units to be made available for larger families is too prescriptive, could affect viability and may not reflect the market demand in some locations. Preferable to



discuss each proposal on its own merits based on the locational and specific demand dynamics.

Janet Woolley (0470)

Considers there is a missed opportunity to include cohousing and housing cooperatives.

Leith Harbour and Newhaven Community Council (0776)

Fully support policy but does not appear to be for all. Range of housing should be integrated through entire development including affordable housing and there should be separate section for elderly and disabled who not always qualify for affordable housing due to financial requirements and categories, therefore, are excluded.

Considers that current developments, particularly build to rent does not provide multi-generational communities and developments should provide local facilities.

Melford Developments Ltd (0308)

Object to policy as it is overly prescriptive and regressive in nature. Should not include all proposals for housing and should be flexible. Unreasonable and disproportionate in scale and kind. Integration should be where possible.

Peter Allen (0336)

Support policy but would like to add support for community-led custom build as a way of delivering mixed communities.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Requests that the policy direction signalled by draft NPF4 (policy 9 – section f) in relation to supporting affordability and choice through new housing proposals is noted.

Scottish Property Federation (0144)

Requirement for 20% of the units to be made available for larger families may fail to support the viability of some build to rent opportunities. Believe objectives should be discussed with developers and investors on a project basis, with a view to requirements for larger family units and affordable housing contributions considered as part of bigger mixed development proposals, and in relation to how a build to rent proposal complements existing housing proposals and supply.

Spire Healthcare Limited (0719)

No specific policy support to the dedicated delivery of housing for older people or private care home accommodation. Mixed communities seeks to support delivery of a mix of housing types and sizes to cater for multi-generational communities, including responding to the needs of older people. However, strict application of Policy Hou 3 in development management decisions could prevent the delivery of dedicated housing for older people on appropriate sites.

Stirling Developments Limited (0303)

Support policy but note that it will be difficult to deliver with a blanket approach to housing density.

Taylor Wimpey and Hallam Land Management Ltd (0603)

Consider new build family housing to be important in meeting demand. Question feasibility to deliver the percentage of units suitable for larger families given density and other policy requirements such as public open space provision.

Watkin Jones Group (0516)

Consider that policy should be more flexible, including a site by site approach to providing family housing (3 bed units) based on specific housing needs, demographics of the area, and the demand for particular products, such as build to rent. Not all sites are suitable or desirable for family housing and therefore this policy should make reference to demand. Policy should expressly identify the range of housing types that are being actively encouraged, including build to rent.

**Modifications sought by those submitting representations:**

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695), HUB Residential (0582)

At paragraph 3.181 acknowledge that Build to Rent operates a different model to traditional housing for sale and requires a specific approach to maintain its integrity.

AREAA (0358)

Reword Policy Hou 3

“Proposals for housing will be permitted if it is demonstrated that:

- a. development provides an appropriate range of housing of different types and sizes based on location and need,
- b. major housing developments of 12 or more units to provide a minimum of 20% of units suitable for larger families and,
- c. the range of housing provided is well integrated through the entire development scheme”.

BDW Trading (0350), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Stewart Milne Homes (0118), Taylor Wimpey (0200), Wright PDL (0078)

Provide further information on the definition of a larger family, the type of housing the Council considers suitable for family housing.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Amend policy to:

Proposals for housing will be permitted if it is demonstrated that:  
development provides an appropriate range of housing of different types and sizes,  
developments of 12 or more units provide a minimum of 30% of units suitable for larger  
families and, the range of housing provided is well integrated through the entire  
development scheme.

Or delete Hou 3 (b) entirely.

Colin and Emma Auld (0021)

Include more houses suitable for families with children (3, 4, 5 + bedrooms with gardens).

Infers inclusion of further sites.

CoMoUK (0728)

Incorporate shared transport solutions within new developments in policy.

Crosslane Group (0356)

Within the supporting text identify that co-living schemes meet a specific housing need  
and should be assessed differently. Or:

Include a specific policy on co-living.

Crosswind Developments Ltd (0184)

Change policy to:

“Proposals for housing will be permitted if it is demonstrated that:

- a. development provides an appropriate range of housing of different types and sizes  
based on location and need,
- b. major developments of 12 or more units to provide a minimum of 20% of units suitable  
for larger families and,
- c. the range of housing provided is well integrated through the entire development scheme

Edinburgh Access Panel (0611)

Include a policy on accessible housing provision with a specified proportion for  
developments over 10.

Hallam Land Management (0615), Mr T Klan (0307)

Add supporting text to indicate ‘This policy may be relaxed where alternative provision for  
elderly or retirement living is provided in conjunction with mainstream market and  
affordable housing’

Hallam Land Management (0615), Mr T Klan (0307), Tarmac (0244)

Delete Hou 3 (a)

Alter threshold in Hou 3 (b) from 12 to 30 or more units and add 'unless it can be demonstrated through compelling evidence that that this would not be practical in market or viability terms'.

Janet Woolley (0470)

Response infers that cohousing and housing cooperatives should be included in policy.

KR Developments Group Limited (0263)

Remove requirement for 20% family housing and consider on a case by case basis.

Leith Harbour and Newhaven Community Council (0776)

Amend Hou 3 (c) to: - ensure range of housing is integrated through entire development including affordable housing.

Include separate section for elderly and disabled.

Melford Developments Ltd (0308)

Increase threshold for units suitable for larger families to 30.

Apply maximum percentage of 20% to greenfield sites and 15% on brownfield land

Peter Allen (0336)

Add support for community-led custom build as a way of delivering mixed communities.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

No change requested, however should note the policy direction signalled by draft NPF4 (policy 9 – section f) in relation to supporting affordability and choice through new housing proposals.

Scottish Property Federation (0144)

Infers that rather requiring 20% family housing the amount should be determined on a project basis, with a view to requirements for larger family units and affordable housing contributions considered as part of much bigger mixed development proposals and considered in relation to how a build-to-rent proposal complements existing housing proposals and supply.

Spire Healthcare (0719)

Amend policy to:

“Proposals for housing will be permitted if it is demonstrated that:

- a) development provides an appropriate range of housing of different types and sizes (unless the overall development is for dedicated provision for housing for older people / specialist housing),
- b) developments of 12 or more units provide a minimum of 20% of units suitable for larger families (unless the overall development is for dedicated provision for housing for older people / specialist housing) and,
- c) the range of housing provided is well integrated through the entire development scheme.”

Stirling Developments Limited (0303)

Support this policy but note that it will be difficult to deliver with a blanket approach to housing density.

Taylor Wimpey and Hallam Land Management Ltd (0603)

No modification specified.

Watkin Jones Group (0516)

Policy should be more flexible, including a site by site approach to providing family housing (3 bed units) based on specific housing needs, demographics of the area, and the demand for particular products, such as build-to-rent.

Policy should expressly identify the range of housing types that are being actively encouraged, including build-to-rent.

**Summary of responses (including reasons) by planning authority:**

Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazledene House Limited (0695), HUB Residential (0582)

As set out in paragraph 3.181 of the Plan, build-to-rent developments are considered to be a strand of mainstream housing therefore should meet with the housing policies of the plan. The Council’s non-statutory Edinburgh Design Guidance (CD047) provides guidance on the approach to be taken to build-to-rent. All developments vary and the planning application process allows for material considerations to be taken into account.

**No modification proposed.**

AREAA (0358), Crosswind Developments Ltd (0184)

The Council consider that as worded the policy provides flexibility. Hou 3 (a) requires that development provides an appropriate range of housing of different types and sizes. Hou 3 (b) requires that as part of this mix where development is 12 or more units that a minimum of 20% of units are suitable for larger families. The requirement is a minimum and is considered to allow sufficient flexibility in the range of house types and size. Density examples set out in the City Plan 2030 Housing Study January 2020 (CD026). Appendix 1 demonstrate that a range of house types can be provided at high density including those suitable for larger families. The inclusion of the word appropriate is considered sufficient

to allow for location and need to be taken into account. The planning application process allows for material considerations, including viability, to be taken into account on a case by case basis. **No modification proposed.**

The inclusion of the word major in Hou 3 (b) is not necessary or appropriate. The policy applies to developments of 12 or more units. The use of the word major alongside the specified 12 units would be inconsistent with what may generally be thought of as major development as defined in The Town and Country Planning (Hierarchy of Developments) Scotland) Regulations 2009 (CD163). **No modification proposed.**

BDW Trading (0350), Dandara East Scotland (0757), Homes for Scotland (0404), Steve Loomes (0767), Stewart Milne Homes (0118), Taylor Wimpey (0200), Wright PDL (0078)

It is considered that sufficient information is provided in the text at paragraph 3.180 of the Plan which states that the mix of size of dwellings should provide for the needs of larger families. This includes larger units of three or more bedrooms, with access to private garden ground from ground or first floor level. The Council's Edinburgh Design Guidance (CD047) sets out further details. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The suggestion that the 20% requirement is either increased to 30% or removed seems to be at odds with each other. The Council does not agree that the 20% requirement should be removed.

Minimum requirement of 20% units suitable for larger families is an established requirement in the Council's non-statutory Edinburgh Design Guidance (CD047), bringing the requirement into policy strengthens this and reflects the need for family housing in Edinburgh.

The Census 2011 showed that 13% of households in Edinburgh are overcrowded (based upon rooms available vs. rooms needed) compared to Scottish average of 9%. 16% of households with dependent children are overcrowded. Larger households (3+persons) in Edinburgh have smaller dwellings than Scottish average: 26% have 4 rooms or more compared to Scottish average of 30%. Families with children are under-represented in terms of migration into the city: 17% of households migrating out of the city were families with children compared to 10% of households migrating in.

The Council does not agree that the requirement for 20% of units to be suitable for larger families should be increased to 30%. Hou 3 (a) requires that development provides an appropriate range of housing of different types and sizes. Hou 3 (b) requires that as part of this mix where development is 12 or more units that a minimum of 20% of units are suitable for larger families. Raising the minimum requirement would reduce the flexibility of Hou 3 (a). The requirement is a minimum and the appropriate range of house sizes may include a higher proportion of units suitable for larger families. **No modification proposed.**

Colin and Emma Auld (0021)

The Plan acknowledges the need for family housing. Policy Hou 3 (b) requires that developments of 12 or more units provide a minimum of 20% of units suitable for larger families. Paragraph 3.180 states that this should include larger units of three or more bedrooms, with access to private garden ground from ground or first floor level. Allocation of sites is considered in the Council's response to issue 20 Assessment of Housing Land Supply. **No modification proposed.**

CoMoUK (0728)

Policy Hou 3 is concerned with housing mix. It is not appropriate to include the suggested reference to shared transport solutions within this policy. **No modification proposed.**

Crosslane Group (0356)

New concepts for housing emerge over time. It is not necessary for the policy to make reference to every type of proposal that might come forward, or for the Plan to contain separate policies for specific models.

Hou 3 (a) states that it must be demonstrated that development provides an appropriate range of housing of different types and sizes. It is appropriate for all housing to be assessed against this policy. The policy as worded provided allows flexibility in the types of housing.

The Plan aims to provide a mix of housing within developments and the planning application process allows for material considerations to be taken into account on a case by case basis. **No modification proposed.**

Hallam Land Management (0615), Mr T Klan (0307)

The aim of Hou 3 is to ensure a mix of house types and sizes to provide for multi-generational living. It would be expected that within this mix there would be accommodation which would be appropriate to a range of ages and needs. It would not be appropriate to refer to relaxation of policy where specific provision is being made for elderly or retirement living. The planning application process allows for material considerations to be taken into account on a case by case basis. **No modification proposed.**

Hallam Land Management (0615), Mr T Klan (0307), Tarmac (0244)

Hou 3 (a) states that it must be demonstrated that development provides an appropriate range of housing of different types and sizes. It is not an aspiration but a policy requirement that an appropriate range of housing is provided. Hou 3 (a) provides potential for multi-generational communities, allowing people to remain in their home or find a new home within the same community and meets the aim of City Plan is to deliver mixed use sustainable communities. The inclusion of the word appropriate within the policy is considered sufficient to allow for location and need to be taken into account. Density examples set out in the City Plan 2030 Housing Study January 2020 (CD026). Appendix 1 demonstrate that a range of house types can be provided at high density including those suitable for larger families. **No modification proposed.**

Hallam Land Management (0615), Mr T Klan (0307), Tarmac (0244), Melford Developments Ltd (0308)

Hou 3 (b) sets a threshold of 12 units for the provision of 20% units suitable for larger families. The raising of this to 30 is not accepted. 12 units is considered to provide an appropriate scale of development to be able to provide this proportion. The suggestion of additional text to provide an exemption to the policy is not appropriate. The planning application process allows for material considerations, including viability, to be taken into account on a case by case basis. **No modification proposed.**

Janet Woolley (0470)

Policy Hou 3 is concerned with range of house type and size it does not address delivery of housing. It would therefore not be appropriate to refer to a particular delivery model such as housing co-operatives or co-housing. Neither provide a specific type or size of property therefore it is not necessary to include them specifically within the policy as they can be assessed against the policy as set out. Types of housing provision would be more appropriately addressed within guidance if necessary. **No modification proposed.**

Leith Harbour and Newhaven Community Council (0776), Edinburgh Access Panel (0611)

Response seems to suggest that developments should include an element of housing set aside for elderly and disabled. Paragraph 3.180 of the Plan states that an inclusive approach to design of market and affordable housing should be taken. Guidance is provided in the Council's Edinburgh Design Guidance (CD047). This supports the Scottish Government's Housing for Varying Needs Standards (CD164) which set out good practice on the design of housing to achieve flexibility and suitability for people of all abilities and is the standard which applies to all Registered Social Landlord (RSL) development. An inclusive approach to all housing is encouraged.

Not all locations will be suitable for accessible housing. Hou 3 (a) requires that development provides an appropriate range of housing of different types and sizes. Paragraph 3.180 states that the mix should respond to the differing needs of residents, including those with special needs and immediate site conditions.

Accessibility is addressed in Building Standards. Standard 4.2 of The Building (Scotland) Regulations 2004 (CD108) requires that every building must be designed and constructed in such a way that: a. in non-domestic buildings, safe, unassisted and convenient means of access is provided throughout the building b. in residential buildings, a proportion of the rooms intended to be used as bedrooms must be accessible to a wheelchair user c. in domestic buildings, safe and convenient means of access is provided within common areas and to each dwelling d. in dwellings, safe and convenient means of access is provided throughout the dwelling, and e. in dwellings, unassisted means of access is provided to, and throughout, at least one level. **No modification proposed.**

Leith Harbour and Newhaven Community Council (0776)

Policy Hou 3 is concerned with the range of type and size of housing. While integration of affordable and market housing is desirable this may not always be practical. For example, on smaller developments of between 20 and 50 flats, it is likely an RSL will want to consolidate ownership of the affordable homes within a single stairwell. It is therefore



appropriate that this is addressed in guidance rather than policy. Non-statutory Affordable Housing Guidance (CD053) provides guidance on integration of affordable housing and states that where practical affordable housing should be integrated with market housing and social rented housing should be situated close to local amenities, services and public transport. It should be tenure blind and well-integrated with housing for sale. Large groupings of the same tenure type should be avoided. **No modification proposed.**

Policy Hou 3 requires a mix of housing types and sizes. Paragraph 3.179 of the proposed plan refers to this requirement as providing potential for multi-generational communities, allowing people to remain in their home or find a new home within the same community as their needs evolve and provides opportunities for informal social and practical support. Build to rent is considered a strand of mainstream housing and Hou 3 will apply.

Proposed plan policy Inf 1 supports housing development where key community facilities are walkable within a 20-minute return trip. Proposals for housing in areas that do not currently meet this walking distances will be considered only where these services can be delivered. It is therefore not necessary to make reference to this within Policy Hou 3 as the Plan should be read as a whole. **No modification proposed.**

Melford Developments Ltd (0308)

The Council does not consider the policy is restrictive or inflexible. Hou 3 (a) includes the word appropriate which allows for consideration of the range and type of housing provided. **No modification proposed.**

Applying a maximum percentage for the proportion of family housing would not be appropriate. There is a need for family housing in Edinburgh and providing a cap on this would reduce the flexibility of the policy to meet that need. It is not desirable to apply a different requirement to brownfield and greenfield sites. The planning application process allows for material considerations to be taken into account on a case by case basis. **No modification proposed.**

Peter Allen (0336)

Policy Hou 3 is concerned with mix of housing it does not address delivery of housing. It would therefore not be appropriate to refer to a particular delivery model such as community-led custom build. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The policy support in draft NPF4 (CD099) in relation to supporting choice through new housing proposals is noted. Policy Hou 3 (a) is considered to provide flexibility to allow for an identified gaps in provision to be considered through the application of the policy and provides for a range of housing of different types and sizes. **No modification proposed.**

Scottish Property Federation (0144)

The policy aims to ensure that across all sites housing suitable for larger families is provided as part of the mix. Hou 3 (b) specifies the percentage requirement for units suitable for larger families. The minimum requirement of 20% units suitable for larger

families is an established requirement in the Council's non-statutory Edinburgh Design Guidance (CD047), bringing the requirement into policy strengthens this and reflects the need for family housing in Edinburgh. The Council does not accept that the requirement should be removed and considered on a case by case basis. The planning application process allows for material considerations to be taken into account on a case by case basis. As set out in paragraph 3.181 of the plan, build to rent developments are considered to be a strand of mainstream housing therefore should meet with the affordable housing policies of the plan. **No modification proposed.**

Spire Healthcare (0719)

The aim of Hou 3 is to ensure a mix of house types and sizes to provide for multi-generational living. It would be expected that within this mix there would be accommodation which would be appropriate to a range of ages and needs. It would not be appropriate to refer to relaxation of policy where specific provision is being made for elderly or retirement living. The planning application process allows for material considerations to be taken into account on a case by case basis. **No modification proposed.**

Stirling Developments Limited (0303)

The proposed plan does not set a blanket approach to density. Policy Env 26 requires identified sites should deliver density and dwelling numbers in line with those set out in the Plan and on other sites development must achieve an appropriate density. Density is addressed at Issue 12 Density. **No modification proposed.**

Taylor Wimpey and Hallam Land Management Ltd (0603)

Hou 3 (a) states that it must be demonstrated that development provides an appropriate range of housing of different types and sizes. The inclusion of the word appropriate is considered sufficient to allow for location and need to be taken into account. Higher densities on urban sites can provide family housing. Density examples set out in the City Plan 2030 Housing Study January 2020 (CD026). Appendix 1 demonstrate that a range of house types can be provided at high density including those suitable for larger families. **No modification proposed.**

Watkin Jones Group (0516)

Hou 3 (a) states that it must be demonstrated that development provides an appropriate range of housing of different types and sizes. The policy as worded provided allows flexibility of the types of housing. The inclusion of the word appropriate is considered sufficient to allow for location and need to be taken into account. The planning application process allows for material considerations to be taken into account on a case by case basis. Paragraph 3.181 addresses build to rent and recognises that it can be delivered rapidly and provide affordable housing. **No modification proposed.**

Watkin Jones Group (0516), KR Developments Group Limited (0263), Hallam Land Management (0615), Mr T Klan (0307)

The policy aims to ensure that across all sites housing suitable for larger families is provided as part of the mix. Hou 3 (b) specifies the percentage requirement for units

suitable for larger families. The minimum requirement of 20% units suitable for larger families is an established requirement in the Council's non-statutory Edinburgh Design Guidance (CD047), bringing the requirement into policy strengthens this and reflects the need for family housing in Edinburgh.

There is a need for family housing in Edinburgh. The Census 2011 showed that 13% of households in Edinburgh are overcrowded (based upon rooms available vs. rooms needed) compared to Scottish Average of 9%. 16% of households with dependent children are overcrowded. Larger households (3+persons) in Edinburgh have smaller dwellings than Scottish average: 26% have 4 rooms or more compared to Scottish average of 30%. Families with children are under-represented in terms of migration into the city: 17% of households migrating out of the city were families with children compared to 10% of households migrating in.

The Council does not accept that the requirement should be removed and considered on a case by case basis. The planning application process allows for material considerations to be taken into account on a case by case basis. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 25</b>	<b>Student Accommodation</b>			
<b>Development plan reference:</b>	Part 3: Policies - p123, Policy Hou 6 Student Accommodation	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Archie Clark (0003)  Cockburn Association (0777)  Crosswind Developments Ltd (0184)  David Fraser (0768)  Edinburgh Napier University (0731)  Elaine Sosinka (0721)  Grange/Prestonfield Community Council (0192)  Julie Robertson (0210)  Juniper Green &amp; Baberton Mains Community Council (0306)  KR Developments Group Limited (0263)  Leith Central Community Council (0614) </td> <td> Leith Links Community Council (0617)  Lynn Grattage (0362)  Scottish Property Federation (0144)  S Harrison Developments Limited (0460)  Southside Community Council (0781)  Summix Capital Limited (0747)  Tiger Developments Ltd (0602)  Unite Group plc (0628)  University of Edinburgh (0464)  Watkin Jones Group (0516) </td> </tr> </table>			Archie Clark (0003) Cockburn Association (0777) Crosswind Developments Ltd (0184) David Fraser (0768) Edinburgh Napier University (0731) Elaine Sosinka (0721) Grange/Prestonfield Community Council (0192) Julie Robertson (0210) Juniper Green & Baberton Mains Community Council (0306) KR Developments Group Limited (0263) Leith Central Community Council (0614)	Leith Links Community Council (0617) Lynn Grattage (0362) Scottish Property Federation (0144) S Harrison Developments Limited (0460) Southside Community Council (0781) Summix Capital Limited (0747) Tiger Developments Ltd (0602) Unite Group plc (0628) University of Edinburgh (0464) Watkin Jones Group (0516)
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<b>Provision of the development plan to which the issue relates:</b>	Policy sets out circumstances in which planning permission will be granted for purpose built student accommodation.			
<b>Planning authority's summary of the representation(s):</b>				
<p><u>Archie Clark (0003), Juniper Green &amp; Baberton Mains Community Council (0306)</u></p> <p>Agree that, as stated in paragraph 2.93 "Purpose-built student accommodation...[is] often being built at the expense of creating strong, sustainable communities" and question if any recent assessment of need has been made in the light of Brexit and reduced non-local student numbers.</p> <p>Off-campus accommodation should be capable of being converted into affordable housing to improve the balance of housing in an area and to ensure that, should there be an over-provision of student accommodation post-COVID, it can readily be used to address the affordable provision identified in SDP2.</p> <p><u>Cockburn Association (0777)</u></p> <p>Concerned that there is no position on over-provision in areas of existing concentrations of student housing and advocate a return to a threshold policy. Query suitability of site area-based threshold in the context of housing and affordable housing provision suggests a threshold based on numbers and density might be better.</p> <p>Design of student accommodation should be capable of adaption to mainstream housing. Ask for clarification of criteria with will be used to determine no adverse impact on established character of an area.</p>				

Crosswind Developments Ltd (0184)

Object to supporting text on the grounds of viability. Consider site size threshold is too small and could render most student housing development sites unviable. Requirement may not be possible once taking into consideration all the other requirements of the plan.

Question the suitability of the proposed mix. Households in social rented housing are often families or older people who will ultimately have different housing requirements. For example, being close to their social networks, being located in areas with easy access to convenience retailing where their shopping needs can be met and near facilities such as doctors, playparks and schools are far more important to them. These are rarely found in city centre locations close to universities. In addition, there are the potentially conflicting lifestyles between residents and students, which quite often result in complaints.

David Fraser (0768)

Object to the limit of 10% of studio accommodation. Cluster flats not suitable for all groups and lack of studios may put people off studying in Edinburgh, studios provide a safer environment for social distancing and limiting the number of studios will result in prices increases for the existing studio accommodation.

Do not agree with requirement for 50% housing on sites above 0.25Ha. Will result in smaller schemes, which pushes rental level higher due to efficiencies, provide smaller amenity space and lower staff numbers creating a less well managed student experience and larger student operators, tend to want schemes of 300 beds minimum which cannot be achieved with this restriction resulting in smaller, less reputable student operators.

Edinburgh Napier University (0731)

No immediate requirement for any further bed spaces but seek a flexible policy framework that would allow future opportunities as and when the University grows and in response to student needs and demand.

Provision of additional purpose built student accommodation in Edinburgh should be delivered in line with demonstrable demand for bed spaces.

Do not have any strong view as to the maximum number of studios that should be permitted, recognise that the provision of a variety of formats of is important to ensure sufficient choice. Suggest that rather than restrict the provision of a particular form of student accommodation product, without any evidence to support this approach, policy should focus on promoting high quality of design to ensure safe and welcoming living environments.

Supportive of reference to amenity but suggest this could be developed further with supporting text added which states this should include common spaces, as well as group and individual study spaces as a minimum. Encourage a design approach that provides flexible private and communal space to meet the future needs of students. This should include the benefits of communal living in cluster flat arrangements, as well as access to study and amenity areas to ensure that there are maximum opportunities to live within buildings outside of individual private bedrooms.

Seek clarification as to whether requirement to provide housing will apply to university led schemes and ask that this is referenced in the policy. Consider this would have an adverse impact on the viability and deliverability of schemes and could inhibit the provision of further purpose built student accommodation.

Elaine Sosinka (0721)

Does not understand why Env policy does not apply to purpose built student accommodation if development to be flexible for future-proofing. Students have the same right to a pleasant environment as everyone else. Green space standards should apply to all accommodation.

Grange/Prestonfield Community Council (0192)

Considers that the Council has been too supportive of applicants and not adequately protected its local communities and residents. Adaptability is required to allow for student demand reduction due to market changes.

Requests that the term “campus” is defined to avoid stand-alone student accommodation proposals being labelled “campus” to escape the housing obligations.

Julie Robertson (0210)

Considers that no more student accommodation is needed in Edinburgh and space should be used for the community itself, for either housing or support services. Buy to let should be very limited on new properties.

KR Developments Group Limited (0263)

Consider that there is insufficient supply of purpose built student accommodation in the city resulting in more students in houses in multiple occupation and other residential dwellings than necessary taking them out of the housing supply and leading to excess demand existing purpose built student accommodation resulting in higher rents.

Requirement for sites greater than 0.25ha to provide mixed use development is too restrictive and will make it difficult to provide new developments of the scale required.

Do not agree with limit of 10% studios. Policy is not necessary and could lead to higher rents on existing stock. Agree that the wellbeing of students is paramount but do not agree that living in studio accommodation leads to social isolation. Preferable for the operators/investors to determine the appropriate mix. If supply and type of accommodation is restricted city could become a less desirable location for students.

Leith Central Community Council (0614)

Wish to see explicit policies limiting student housing to prevent transient populations undermining the social fabric that underpins and supports high density.

Planning permission for student accommodation should only be granted if it has been demonstrated that the proposal will not result in an excessive concentration of student

accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality. Developments should be close to the universities and colleges and accessible by public transport.

Requirement for 50% housing should apply to all sites. Housing should comprise 50% of all student accommodation floor space and not units.

Should require the timely monitoring of capacity (headcount), units and footprint dedicated to students to enable early detection of negative impact on the availability of permanent residential units and skewed demand (towards transient population needs) at local shops.

#### Leith Links Community Council (0617)

Purpose built Student Accommodation unfit for purpose. It is too expensive and many students would anyway prefer to live in the community. When students are away on vacation, it is used as short term tourist lets. Student accommodation should only be consented / built for administration by a local college or university and not for profit by independent commercial operators. There is too much student accommodation being built. The need is reducing post Covid Any future student accommodation should only be built as part of innovative designs such as mixed age intersectional housing complexes.

#### Lynn Grattage (0362)

All student accommodation needs to be built within a 20 minute walk of the educational establishment. Exceptions might be nearer Herriot Watt University at Riccarton or students working at the bush estate, where they could be on a bus corridor to those places.

#### Scottish Property Federation (0144)

Policy will make it hard to propose any new purpose built student accommodation to meet the city's student accommodation demand, unless it is a smaller proposal that would come below the 0.25 ha size, which would be at a size of 100 or so beds. However, developers need to attract investors and the investment appetite for student accommodation is mostly fixed on much bigger developments.

Policy of requiring contribution to housing and affordable housing for a development above 0.25ha must be dropped.

Requirement to limit studio flats to no more than 10% is overly prescriptive and should be removed. Restriction could remove opportunity to develop student accommodation that might be targeted at bespoke forms of student requirement, such as postgraduates.

#### S Harrison Developments Limited (0460), Summix Capital Limited (0747)

Supportive of accessibility by public transport and active travel however Council considers areas of high concentration to be in excess of 50% students, areas with lower student concentrations tend to be further away from university campuses making it more difficult to provide accommodation where there are good active travel routes.

Supportive of high levels of amenity to students however raise concerns over the open space requirement being applied too rigidly.

Object to limit of 10% studios. The mix and type of student accommodation should be driven by market evidence. Impact from COVID-19 is likely to make studio accommodation a more popular choice. Consider there are sites that are not suitable for a cluster model and studio rooms can offer more flexibility and efficiency.

No measurable evidence of harm from student accommodation, (refers to Report to Planning Committee of 25 February 2016) and the Council maintain that they will have a considerable surplus of 20,000 units in available housing land supply so it is unclear why this additional requirement for mainstream housing is being requested on student accommodation sites. Windfall sites do not prevent other land uses from coming forward through an arbitrary requirement for mainstream residential housing and are assessed on their individual merits.

Refers to Appeal Decision (PPA-230-2298) and agree with conclusion of Reporter and consider that it would be illogical to refuse proposals for student accommodation where there is no evidence of harm.

Object to requirement to provide 50% housing and question why such a significant policy requirement is not within the proposed policy itself. No justification provided and requirement would have significant viability implications. Purpose-built student accommodation can free up general residential housing and impact of significant number of economically active students in an area has a positive effect on local businesses providing direct and indirect employment. Would significantly reduce floor space which would increase the fixed costs leading to higher rents. This could have the potential of making schemes unviable for delivery particularly in the lower rent areas away from main campuses and would not deliver the accommodation needed to meet the student population.

The threshold of 0.25 ha is much too low to make delivery of student and residential housing viable and does not allow sufficient space for clear separation of students and residential populations. Each use type would require its own cycle storage, car parking (where required), refuse storage and plant rooms, 20% residential family home requirement including access to private gardens, external amenity space and access and egress to principal entrances. Each of these spaces require a significant area at ground floor and on smaller sites this is unlikely to be feasible, driving accommodation to upper floors and making building much taller. Making these smaller sites viable would unlikely be possible due to existing constraints which would reduce the number of people that can be accommodated creating less efficient use of land making development economically unviable.

#### Southside Community Council (0781)

Believes provision of dedicated student accommodation in area has reached saturation point and hope better public transport and active travel will open up wider areas of Edinburgh as realistic options for student accommodation.



Supports the requirement for provision of open space in student accommodation, but there should be a percentage requirement as in other development categories. Also supports the limit of 10% studios in terms of potential for future adaptability.

Supports para 3.186 which aims to create more balanced developments also incorporating dwellings with an affordable housing requirement but wishes this to be included in the body of the policy.

Consider it does not appear that sites for student accommodation are strategically assessed through the Plan process, meaning that all student accommodation applications are speculative. Suggests greater collaboration between the Council, institutions and student housing providers in planning strategically.

#### Tiger Developments Ltd (0602)

Agrees that student accommodation should be located on sites that have good access by public transport and active travel routes.

Supportive of a cluster biased scheme with a target of 10% studio provision. Considers it is important that the design of purpose built student accommodation creates safe and pleasant places for occupants, residents, and the wider community.

Agree that amenity, including open space requires to be considered as part of this policy.

Technical considerations including daylight and sunlight, open space, internal space standards and noise should also be considered.

#### Unite Group plc (0628)

Consider the wording of paragraph 3.185 does not go far enough to set out the importance of purpose built student accommodation and suggest the wording from the current adopted plan is carried forward.

Supports criteria Hou 6 (a)

Agree with the principle of Hou 6 (b), but do not support the wording of paragraph 3.187 which states that student accommodation is expected to be designed to provide 'equivalent amenity required for housing', or the 20% site area open space requirement set out under policy Env 31. It is a distinct type of accommodation and amenity standards should be specific to address the particular characteristics of these types of developments. Consider space standards are to be considered they should be based on HMO guidelines as a minimum safeguard, with the market then able to bring forward larger units and included in the Plan so they are properly considered and examined.

Support Hou 6 (c) but recommend the supporting text in paragraph 3.188 recognises the important role that studios play in meeting all student accommodation needs, particularly the overseas and post-graduate student market. As part of development management decisions, flexibility should be applied to support proposals for a higher level of studios where there is a clear market demand. Justification for this could be evidenced through a demand assessment.

Meaning of Hou 6 (d) is unclear and unclear how this will be used in the assessment of applications. Consider that in mixed use areas, additional student accommodation will have no material effect on the established character of the area or any adverse effect on existing residents. Should continue to recognise that it is preferable that student needs are met in purpose built accommodation and accept that this should be allowed in areas of the city where students already reside.

Not adverse to the principle of student schemes delivering market and affordable housing as part of the mix, however, should only be required as part of larger development schemes and not applied as a blanket approach to all sites of 0.25ha or greater as proposed. Desire to provide mainstream housing should also not be at the expense of the delivery of other housing types. Suggest that the wording of para 3.186 is amended

#### University of Edinburgh (0464)

Plan should be explicit in its support for the development of purpose built student accommodation, however, needs to reflect current needs and demands of the student population in a sustainable manner, and in locations where development can be integrated successfully into its surroundings.

Benefits the university brings to the city should not be underestimated and further support for the growth and continuation of its development activity should be explicitly stated in policy.

Agree that student accommodation should be located on sites that have good access by public transport and active travel routes to further and higher education institutions.

Agree that amenity, including open space requires to be considered as part of this policy. Technical considerations including daylight and sunlight, open space, internal space standards and noise should also be considered. Consider it essential that each development has space to create a student common room / amenity space and other support facilities to foster a community.

Note that studio flats do not foster healthy student communities and can often lead to social isolation. Welcome the reduction of studios to no more than 10%, as this closely aligns with the University's Residential Strategy. In addition to concerns of the high cost of studios, they also pose flexibility issues as they cannot be readily converted to other residential uses.

Consider that supplying purpose built student accommodation will allow for a release of some private rented accommodation.

Welcomes the removal of the requirement that purpose built student accommodation needs to be built exclusively for and managed by universities and considers reference should be made to consultation with them. Planning applications for student accommodation development should evidence, that it is being brought forward to satisfy the universities and college's accommodation demand which would reduce the speculative applications and ensure no negative perception of "overprovision."

Consider there is a significant under supply of purpose built student accommodation to meet demand in the city, however the location and concentration of additional supply needs to be monitored carefully to reflect a very dynamic market and demand position.

Recommended that Policy Hou 6 be amended to include reference to the need for applications to demonstrate evidence of need and demand and that the University and other higher education institutions should be afforded an opportunity to respond as consultees on any new applications for purpose built student accommodation. Submit a position paper setting out the University's views.

Do not support requirement for 50% housing on sites, as this conflicts with their ability to deliver PBSA schemes at an affordable and deliverable level, and with a set target of a minimum of 200 units, as dictated within the University's Residential Strategy. The requirement would also reduce the density of student accommodation that could be achieved on any given site, with the result being that the same quantity of student accommodation is required over a greater number of sites, making it more difficult to operate and maintain. The stated 0.25ha is a very small area to require 50% housing on and would result in a site where the student accommodation component would be too small to be operationally viable. The University maintain that this 50:50 housing provision should not apply to university-led and delivered student accommodation on sites which are being progressed by the University.

#### Watkin Jones Group (0516)

Proposed plan should be more explicit in its support for the development of purpose built student accommodation. Agree with criteria a and b. Object to supporting text that student housing should be designed to provide equivalent amenity required for housing as the amenity requirements for need to be considered on a case by case basis, reflect market trends and needs of students. Fully support principle of providing suitable levels of amenity but with opportunities for shared spaces, communal areas, as well as on site facilities and amenities, the comparison with mainstream housing is not appropriate, nor reflective of occupant needs.

Do not welcome the reduction of studio flats to no more than 10%. Students should be entitled to a choice of accommodation, and it should be for the market to respond.

Policy approach should focus on the principle of the use being demonstrated as acceptable, rather than the form of accommodation within it. The approach also fails to acknowledge the wider role of studio style accommodation in terms of futureproofing, and suitability for conversion to build to rent co-living etc.

Agree with Hou 6 (d).

#### **Modifications sought by those submitting representations:**

##### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Require off-campus accommodation to be capable of being converted into affordable housing.

##### Cockburn Association (0777)

Suggest a threshold for provision of housing based on numbers and density.

Suggests design of student accommodation should be capable of adaption to mainstream housing.

Crosswind Developments Ltd (0184)

Delete Para 3.186

David Fraser (0768)

Remove Hou 6 (c).

Suggests that schemes which are all studios, or a high proportion of studios should have a minimum amount of amenity space per bedroom.

Remove site size limit of student housing. Suggest alternative to have a percentage of larger student scheme, say over 250 beds, to provide a percentage of beds at an affordable rent.

Edinburgh Napier University (0731)

Provide flexibility in policy to allow development in response to need and demand.

Suggest that rather than limiting studio flats to 10% that policy should focus on promoting high quality of design to ensure safe and welcoming living environments.

Require development to be delivered in line with demonstrable demand for bed spaces.

Add supporting text to state that amenity should include common spaces, as well as group and individual study spaces as a minimum.

Include reference in policy whether requirement to provide housing will apply to university led schemes.

Elaine Sosinka (0721)

Infers policy should require student accommodation to meet green space standards for housing.

Grange/Prestonfield Community Council (0192)

At Hou 6 (b) define "suitable" and add "and would not detract from the amenity of existing residents."

At Hou 6 (b) add: "All proposals must show how the student accommodation could be adapted to normal housing meeting all standards applicable to housing."

At Hou 6 (d) define "area" as applicants have used a loose definition to suit their case to the detriment of existing communities.

At 3.186 in 5th line before the word “campus” insert “existing university and FE college “

Julie Robertson (0210)

No modification specified but infers that student accommodation should not be supported in the Plan.

KR Developments Group Limited (0263)

Infers requirement for sites greater than 0.25ha to provide mixed use development should be amended.

Infers removing criteria Hou 6 (c)

Leith Central Community Council (0614)

Include policy limiting student housing.

Require demonstration that proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.

Remove threshold for requirement for 50% housing and apply to all sites.

At 3.186 housing should comprise 50% of all student accommodation floor space and not units.

Include requirement for monitoring of capacity (headcount), units and footprint dedicated to students to enable early detection of negative impact on the availability of permanent residential units and skewed demand (towards transient population needs) at local shops.

Leith Links Community Council (0617)

Student accommodation should only be built for administration by a local college or university.

Student accommodation should only be built as part of innovative designs such as mixed age intersectional housing complexes.

Lynn Grattage (0362)

Infers that policy should require all student accommodation to be built within a 20 minute walk of the educational establishment.

Scottish Property Federation (0144)

Remove requirement for housing for developments above 0.25ha.

Removes Hou 6 (c).

S Harrison Developments Limited (0460), Summix Capital Limited (0747)

Delete Hou 6 (c) and paragraph 3.186.

Southside Community Council (0781)

Include a percentage requirement for open space.

Include requirement for 50% housing on sites greater than 0.25ha in the body of the policy.

A more strategic approach to site identification should be taken.

Tiger Developments Ltd (0602)

Technical considerations including daylight and sunlight, open space, internal space standards and noise should also be considered.

University of Edinburgh (0464)

Include reference to the need for applications to demonstrate evidence of need and demand.

Include requirement that the University and other higher education institutions should be afforded an opportunity to respond as consultees on any new applications for PBSA.

50:50 housing provision should not apply to university-led and delivered student accommodation on sites.

Watkin Jones Group (0516)

Give more explicit support to development of PBSA.

Remove supporting text that student housing should be designed to provide equivalent amenity required for housing.

Remove limitation on studio flats.

Unite Group plc (0628)

Delete Hou 6 (d)

Amend para 3.185 to:

“Purpose built student accommodation makes a valuable contribution to housing Edinburgh’s many students. It is preferable in principle that student needs are met as far as possible in purpose built and managed schemes rather than the widespread conversion of family housing. Increasing the amount of purpose built student accommodation assists the growth of universities and the attractiveness of the city as a centre for higher education. Ensuring it is delivered at the right scale and in the right locations is required to balance this with the needs of the existing community and the need for residential

dwellings. It is particularly important that the design of purpose-built student accommodation should create safe and pleasant places for occupants, residents and the wider community, create a mix of uses avoiding a single land use and ensure adaptability.”

Amend para 3.186 to:

“Larger sites provide an opportunity to balance the mix of land uses and to contribute to delivery of housing. A mix of student accommodation and housing is required on all sites greater than 0.5ha. Housing should comprise approximately 50% of all student accommodation units. Some flexibility to both the site threshold and percentage split of housing may be justified where required to reflect individual site considerations, design proposals and housing need. A variety of forms of housing delivery will be acceptable to satisfy this policy; in addition to traditional homes (built for sale) this will also include Build to Rent (BTR) and co-living developments. The affordable housing policy of 35% will apply. This will not apply in self-contained campus locations. Council Guidance sets out further details.”

Amend para 3.187 to:

“To avoid additional pressures on existing local amenities and open space there is a need for purpose-built student accommodation to provide students with high quality living and adequate on-site amenity spaces and communal facilities. The amount of internal and external amenity space in purpose-built student accommodation should be assessed on an individual case-by-case basis taking into account site context and the quality and functionality of amenity provision on offer. Student accommodation should be designed to provide appropriate daylight and sunlight, noise and internal space standards for students. Internal space standards for student beds should be based on HMO guidelines as a minimum safeguard.”

Amend para 3.188 to:

“Studio flats play an important role in meeting student accommodation needs, particularly the overseas and post-graduate market. However, studio flats can lead to social isolation and in high concentration do not foster healthy student communities. Cluster flat arrangements allow the opportunity for students to interact and improve well-being. Flexibility on the 10% studio limit may be permissible where need is evidenced through a market demand assessment.”

#### **Summary of responses (including reasons) by planning authority:**

David Fraser (0768), Edinburgh Napier University (0731), KR Developments Group Limited (0263), Scottish Property Federation (0144), S Harrison Developments Limited (0460), Summix Capital Limited (0747), Unite Group plc (0628), Watkin Jones Group (0516)

Hou 6 (c) requires that no more than 10% studio flats are provided. The limit on this type of provision is intended to ensure that student accommodation is meeting the needs of students. Studio flats can lead to social isolation and in high concentration do not foster healthy student communities. They are generally more expensive. Cluster flat arrangements allow the opportunity for students to interact and improve wellbeing. In addition, cluster flat arrangements allow developments to be future proofed so that they

can easily be converted to traditional residential dwellings should there be a reduction in demand.

University of Edinburgh (0464) provide support in their representation for the 10% limit on studio flats. The University believes that the studio flats do not foster healthy student communities. The studio stock that they have is usually the most expensive and has the lowest student uptake.

The limit recognises that there is a role for studio accommodation but that most student needs are best met in traditional cluster flat arrangements. **No modification proposed.**

Crosswind Developments Ltd (0184), KR Developments Group Limited (0263), Scottish Property Federation (0144), S Harrison Developments Limited (0460), Summix Capital Limited (0747), University of Edinburgh (0464)

The concentration of students, as a proportion of the transient population, can undermine the social and physical fabric which defines a community and place. In recent years the development of a significant number of larger student developments, in the Old Town, South Side and Fountainbridge have been on sites where much needed housing would previously have been delivered. This policy seeks to balance the need for additional student accommodation with the need for mainstream and affordable housing in the most sustainable locations to meet the wider need of the community. The limited quantity of housing development on site and consented across the city, and in the city centre in particular, means that it is essential to consider the merit of additional student accommodation while giving due consideration to the opportunity to deliver much need housing. A significant element of Edinburgh's character is the balanced sustainable communities which make up the whole city including the city centre. Balanced sustainable communities require the dominant residential component to be permanent and not transient.

Paragraph 3.186 requires that a mix of student accommodation and housing is required on sites greater than 0.25ha. This requirement is currently set out in non-statutory Student Housing Guidance (CD048). In establishing the principles of delivering housing on the same sites as purpose built student accommodation an examination of site sizes and density of student accommodation applications was carried out.

This analysis demonstrated that off campus student development generally generates 782 bedspace per ha. Development capacity at West Tollcross and West Approach Road where consented residential development has been changed into student accommodation was also analysed. This analysis demonstrates that on comparable sites, development generates 282 residential units per ha.

In considering mixed used development, a variety of theoretical site areas, applying a 50/50 development split between student accommodation and housing were considered. This approach will generate a split of around 57% students to 43% residents, based on two residents per dwelling,

The impact of student only development and mixed use development has been tested, on sites of 0.3ha, 0.5ha and 0.75ha, using the 2011 census data. This analysis demonstrates that mixed use development mitigates the impact of larger student development, that in areas where students represent around 20% of the population, purpose-built student



development will significantly change the mix of residents, while mixed use development will moderate the level of change, that in areas with higher existing levels, over 50%, the mixed use development will have a near neutral impact and in areas with the highest existing concentrations, delivering mixed use development can reduce the concentration of students.

There are a number of examples of consents which have delivered housing alongside student accommodation at around 50% of the student accommodation floorspace.

APPLIC. NO	ADDRESS	Area Ha	Dwellings	Student Beds	% floorspace dwellings	% floor space student accom.
<u>20/02827/FUL</u>	Abbey Lane, 2	0.51	66	298	45	55
20/00972/FUL	Iona Street, 48-50	0.53	80	250	50	50
<u>19/04557/AMC</u>	London Road, 151	0.75	107	377	51	49
<u>20/00292/FUL</u>	Peffer Place, 2 (Site 90 Metres South Of)	1.19	64	153	70	30
18/02719/FUL	Sciennes Road (Royal Hospital for Sick Children)	1.47	126	323	63	37

The policy sets out requirements. Any exception to this will be considered through the planning application process. Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101), allows for material considerations, including viability, to be considered on a case-by-case basis. It is open to developers, including universities, to justify mono use developments where they consider mixed use development inappropriate or incompatible.

The Council's strategy of seeking housing on sites proposed for student housing if they are larger than 0.25ha is not a new policy approach as set out in criterion c of the non-statutory Student Housing Guidance (CD048). Policy Hou 6 of the Plan seeks to formally include this existing policy requirement in the guidance within the development plan.

The requirement for housing alongside all commercial development, including student housing, is set out in Policy Econ 2. **No modification proposed.**

#### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Policy supports student accommodation and allows for development in response to need and demand. Paragraph 3.137 sets out that student accommodation is expected to be designed to provide equivalent amenity required for housing. This includes daylight and sunlight, open space, internal space standards and noise. This allows adaptability for future conversion to housing. **No modification proposed.**

#### Cockburn Association (0777)

Some locations by their nature are better placed to accommodate a particularly high concentration of students. It is not appropriate to apply a percentage threshold through the development plan. Hou 6 (d) requires that there will be no adverse impact on the

established character of the area. This enables flexibility to apply a realistic interpretation based on the established character of the area.

A minimum site size is needed to ensure that it would be possible to deliver housing alongside student accommodation with regard to viability and mix of housing and student accommodation. **No modification proposed.**

Paragraph 3.137 of the Plan sets out that student accommodation is expected to be designed to provide equivalent amenity required for housing. This includes daylight and sunlight, open space, internal space standards and noise. This allows adaptability for future conversion to housing. **No modification proposed.**

David Fraser (0768)

Studio accommodation is expected to be designed to provide equivalent amenity required for housing and this includes internal space standards. Space standards are set out in the Council's Edinburgh Design Guidance (CD047). This sets a minimum internal floorspace for studios. **No modification proposed.**

It would not be practical to remove the threshold. A minimum site size is needed to ensure that it would be possible to deliver housing alongside student accommodation with regard to viability and mix of housing and student accommodation. **No modification proposed.**

Edinburgh Napier University (0731)

Policy supports student accommodation and allows for development in response to need and demand. **No modification proposed.**

Student housing is a commercial development and where this is not provided for a specific institution it is only likely to be built where it is financially viable which is likely to be in areas of demand. Hou 6 (a) guides the location of student accommodation and Hou 6 (c) ensures that development can be integrated into its surroundings. The Plan requires that student accommodation is designed to provide equivalent amenity to housing. This allows flexibility for adaptation to housing in future should demand for student accommodation fall. **No modification proposed.**

Paragraph 3.137 of the Plan sets out that student accommodation is expected to be designed to provide equivalent amenity required for housing. This includes daylight and sunlight, open space, internal space standards and noise. Standards are set out in the Council's Edinburgh Design Guidance (CD047). **No modification proposed.**

It is not considered necessary to add supporting text to state that amenity should include common spaces, as well as group and individual study spaces as a minimum. Paragraph 3.187 states that there is a need for purpose-built student accommodation to provide students with high quality living and adequate on-site amenity spaces and communal facilities. **No modification proposed.**

Paragraph 3.186 states that the requirement for housing does not apply in self-contained campus locations. Out with these areas the policy would apply regardless of the developer. **No modification proposed.**

Elaine Sosinka (0721)

Policy Env 31 requires that proposals for new development, including student accommodation, include the provision of open space that forms at least 20% of the total site area. Policy Env 32 sets out the same requirement for flatted developments where communal provision is necessary. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

It is not necessary to define suitable amenity in Hou 6 (b) or add the suggested text. Amenity requirements are set out in Env 33. The Council's Edinburgh Design Guidance (CD047) provides further information on how to ensure proposals provide acceptable levels of amenity for new occupiers and neighbouring developments. Paragraph 3.137 of the Plan sets out that student accommodation is expected to be designed to provide equivalent amenity required for housing. This includes daylight and sunlight, open space, internal space standards and noise. The Plan therefore does require that standards are met which allow adaptability. Standards are set out in the Council's Edinburgh Design Guidance (CD047). **No modification proposed.**

It is suggested that at Hou 6 (d) that the 'area' should be defined. The Council does not agree as the area will be dependent on the individual circumstances of a proposal and its location. This is best defined through the planning application process. **No modification proposed.**

The Council does not agree that it is necessary to include the word "existing" to the policy text referring to campus locations. Any future self-contained campus would be assessed against this policy. **No modification proposed.**

Julie Robertson (0210)

Purpose built student accommodation makes a valuable contribution to housing the student population and is supported in the plan. The policy ensures that it will be delivered at the right scale and in the right locations to balance the provision of purpose built student accommodation with the needs of the existing community, the need for residential dwellings and a stable population. **No modification proposed.**

Leith Central Community Council (0614)

Purpose built student accommodation makes a valuable contribution to housing the student population and is supported in the plan. The policy ensures that it will be delivered at the right scale and in the right locations to balance the provision of purpose built student accommodation with the needs of the existing community, the need for residential dwellings and a stable population. Limiting student housing would not provide flexibility to meet with demand which changes over time. **No modification proposed.**

Policy requires that there will be no adverse impact on the character of the area. The consideration would include the concentration of students in the area. Student housing guidance which is subject to regular review provides guidance. A significant element of Edinburgh's character is its balanced sustainable communities. The student population can be a significant element of the transient population. Balanced sustainable

communities require the dominant residential component to be permanent and not transient however student accommodation is only one land use which contributes to the transient population within Edinburgh. Imbalance in communities cannot solely be controlled through purpose built student accommodation. Policy requirement for housing on sites 0.25ha or greater is intended to ensure development of mixed communities. **No modification proposed.**

It would not be practical to remove the threshold. A minimum site size is needed to ensure that it would be possible to deliver housing alongside student accommodation with regard to viability and mix of housing and student accommodation. **No modification proposed.**

It is accepted that a degree of inconsistency can be perceived between the supporting text at paragraph 3.186 of the Plan which requires that on sites greater than 0.25ha housing should comprise 50% of all student accommodation units and Policy Econ 2 which requires that proposals for commercial uses, including student accommodation provide at least 50% of the site for housing. No modification proposed however should the Reporter see merit in further clarification for consistency between policies seeking the same objective the Council would accept this. **No modification proposed.**

As part of the planning application process and consideration against Hou 6 (d) the impact on the character of the area would be considered on a case by case basis at the time of application. It would not be appropriate to include a requirement for monitoring within the Plan. Monitoring of student accommodation proposals is carried out by the council and reported on an annual basis in the Student Accommodation Schedule (CD058). **No modification proposed.**

#### Leith Links Community Council (0617)

Purpose built student accommodation makes a valuable contribution to housing the student population and is supported in the plan. The policy ensures that it will be delivered at the right scale and in the right locations to balance the provision of purpose built student accommodation with the needs of the existing community, the need for residential dwellings and a stable population. Limiting student housing would not provide flexibility to meet with demand which changes over time. **No modification proposed.**

It is not appropriate to require that all student accommodation is built for or managed by a college or university. It is not always possible for institutions to deliver or take leases for all of their student's needs. **No modification proposed.**

Policy Hou 6 requires a mix of housing and student accommodation on larger sites. **No modification proposed.**

#### Lynn Grattage (0362)

Limiting student accommodation to a 20 minute walk of institutions could result in intensifying the concentration of students in certain areas. Student accommodation is not always built for a particular institution and it is not possible to control the occupation of student accommodations to those attending particular institutions it would not be possible to require this limitation. Hou 6 (a) requires that there is good access by public transport and active travel routes to further and higher education institutions. This ensures that

students are able to travel easily and without the use private transport to their place of study. **No modification proposed.**

S Harrison Developments Limited (0460), Summix Capital Limited (0747)

Policy requires that there is good access by public transport and requires that there will be no adverse impact on the established character of the area. It does not make any reference to high concentrations. **No modification proposed.**

Env 31 Useable Open Space in New Development requires that all proposals containing new-build development shall include the provision of good quality, attractive useable and where appropriate publicly accessible open space that forms at least 20% of the total site area. Supporting text states that this includes specialist housing built for occupation by groups such as students. The supporting text sets out that where that where proposals do not meet the full requirements of the policy on-site they may be supported if certain circumstances are met. The planning application process allows for consideration of material considerations on a case by case basis. **No modification proposed.**

The policy text applies to all proposals for purpose-built student accommodation. The supporting text sets out the requirement for sites over 0.25ha to provide housing. The Town and Country Planning (Scotland) Act 1997 37 (2) (CD101) requires that in determining an application for planning permission the authority shall have regards to the provisions of the development plan, so far as material to the application, and to any other material considerations. This means all provisions of the development plan and not just the policy text. Policy Econ 2 Commercial Development Commercial Development states that proposals for commercial uses within the urban are on sites 0.25ha or larger, should where compatible and appropriate within the site context, provide at least 50% of the site for housing. The supporting text states that this applies to developments for commercial uses including student housing. It is not considered necessary to include the reference to the requirement for housing on some sites within the policy text. **No modification proposed.**

It is not appropriate to define areas within the plan. Communities vary in nature and what might be determined as part of an area will depend on a number of factors. **No modification proposed.**

It is not accepted that the exemption from the requirement for housing should not apply to any new self-contained campuses. It is appropriate that these should be treated in the same way as existing campus locations. **No modification proposed.**

Southside Community Council (0781)

Env 31 Useable Open Space in New Development requires that all proposals containing new-build development shall include the provision of good quality, attractive useable and where appropriate publicly accessible open space that forms at least 20% of the total site area. Supporting text states that this includes specialist housing built for occupation by groups such as students. **No modification proposed.**

The policy text applies to all proposals for purpose-built student accommodation. The supporting text sets out the requirement for sites over 0.25ha to provide housing. The Town and Country Planning (Scotland) Act 1997 37 (2) (CD101) requires that in

determining an application for planning permission the authority shall have regards to the provisions of the development plan, so far as material to the application, and to any other material considerations. This means all provisions of the development plan and not just the policy text. It is not considered necessary to include the reference to the requirement for housing on some sites within the policy text. Policy Econ 2 Commercial Development Commercial Development states that proposals for commercial uses within the urban are on sites 0.25ha or larger, should where compatible and appropriate within the site context, provide at least 50% of the site for housing. The supporting text states that this applies to developments for commercial uses including student housing. **No modification proposed.**

Demand for student accommodation fluctuates. Policy Hou 6 guides purpose-built student accommodation to appropriate locations and provides flexibility to provide for development where demand exists. It is not considered to be necessary to have a more strategic approach to the location of student accommodation. **No modification proposed.**

#### University of Edinburgh (0464)

Student housing is a commercial development and where this is not provided for a specific institution it is only likely to be build where it is financially viable which is likely to be in areas of demand. Hou 6 (a) guides the location of student accommodation and Hou 6 (c) ensures that development can be integrated into its surroundings. The Plan requires that student accommodation is designed to provide equivalent amenity to housing. This allows flexibility for adaptation to housing in future should demand for student accommodation fall. **No modification proposed.**

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 Schedule 5 (CD103) sets out bodies to be consulted on planning applications. Universities are not included within this. As universities are not statutory consultees it would not be appropriate to state within the Plan that they should be consulted on applications for purpose built student accommodation. **No modification proposed.**

#### Tiger Developments Ltd (0602)

The final sentence of paragraph 3.187 states that equivalent amenity includes daylight and sunlight, open space, internal space standards and noise. **No modification proposed.**

#### Unite Group plc (0628)

It is preferable that student needs are met as far as possible in well managed and regulated schemes and policy Hou 6 supports this. However, the quantity of students can place pressures on the physical and social infrastructure of an area and change the area's character. The concentration of students, as a proportion of the transient population, can undermine the social and physical fabric which defines a community and place. While students make many positive contributions to society, excessive concentrations may over time result in a poor quality of place, a diminished sense of community and make an area less attractive to all sections of the population. Student accommodation is only one land use which contributes to the transient population within Edinburgh. In mixed area the impact of student accommodation may be greater than in more mono-use areas as it may tip the balance in the community. Hou 6 (d) is necessary to ensure that student

accommodation is appropriate to an area. Council guidance provides details of how policy will be implemented. **No modification proposed.**

It is not necessary to further state the benefits of purpose built student accommodation within paragraph 3.185. The first sentence recognises the valuable contribution that it makes to housing students. **No modification proposed.**

It is not necessary to add to paragraph 3.186 additional text to provide for flexibility on site threshold and percentage split of housing or tenure. The planning application process allows for material considerations to be taken into account on a case by case basis. It is also not necessary to specify particular types of housing. Build to rent is considered to be a strand of mainstream housing. **No modification proposed.**

Student accommodation is primarily a place of residence, and it is important that it provides as equivalent amenity required for housing. The provision of equivalent amenity allows for adaptability for any future conversion to residential use. **No modification proposed.**

#### Watkin Jones Group (0516)

Policy Hou 6 and supporting text at paragraph 3.185 acknowledges the valuable contribution of purpose built student accommodation. **No modification proposed.**

Paragraph 3.137 sets out that student accommodation is expected to be designed to provide equivalent amenity required for housing. This includes daylight and sunlight, open space, internal space standards and noise. Academic terms cover a significant part of the year, and it is important to ensure that students have an equivalent level of amenity to housing during this time. In addition, the provision of an equivalent level of amenity allows for adaptability for future conversion to residential use. **No modification proposed.**

#### **Reporter's conclusions:**

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#### **Reporter's recommendations:**

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<b>Issue 26</b>	<b>Housing Policies</b>			
<b>Development plan reference:</b>	Part 3: Policies - p 122-124	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Airbnb (0474)  Andy Agnew (0562)  Archie Clark (0003)  Barratt David Wilson Homes (0677)  Calex Group Ltd (0556)  Christopher Brown (0378)  Cockburn Association (0777)  Cramond &amp; Barnton Community Council (0243)  Deirdre Henderson (0727)  Edinburgh World Heritage (0339)  Esk Property LLP (0726)  Glenmorrison Group (0600)  HCPII Properties 101LP (0517)  Homes for Scotland (0404) </td> <td> Juniper Green &amp; Baberton Mains Community Council (0306)  Leith Central Community Council (0614)  Melford Developments Ltd (0308)  Mrs Patricia Stott (0349)  New Town &amp; Broughton Community Council (0254)  Philip Endecott (0079)  Southside Community Council (0781)  Terry Levinthal (0313)  Toby Subiotto (0580)  SEPA (0012)  Shelagh Sharp (0111)  Wright PDL (0078) </td> </tr> </table>			Airbnb (0474) Andy Agnew (0562) Archie Clark (0003) Barratt David Wilson Homes (0677) Calex Group Ltd (0556) Christopher Brown (0378) Cockburn Association (0777) Cramond & Barnton Community Council (0243) Deirdre Henderson (0727) Edinburgh World Heritage (0339) Esk Property LLP (0726) Glenmorrison Group (0600) HCPII Properties 101LP (0517) Homes for Scotland (0404)	Juniper Green & Baberton Mains Community Council (0306) Leith Central Community Council (0614) Melford Developments Ltd (0308) Mrs Patricia Stott (0349) New Town & Broughton Community Council (0254) Philip Endecott (0079) Southside Community Council (0781) Terry Levinthal (0313) Toby Subiotto (0580) SEPA (0012) Shelagh Sharp (0111) Wright PDL (0078)
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<b>Provision of the development plan to which the issue relates:</b>	Hou 5, Hou 7, Hou 8, Hou 9.			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>Hou 5 Conversion to Housing</b></p> <p><u>Archie Clark (0003), Juniper Green &amp; Baberton Mains Community Council (0306)</u></p> <p>No definition of what a 'satisfactory residential environment' is but consider a feature of other conversions has been unfeasibly small units insufficient for quality of life and so a minimum size of unit should be stated.</p> <p><u>Barratt David Wilson Homes (0677), Homes for Scotland (0404), Wright PDL (0078)</u></p> <p>Further information is required regarding what is meant by a "satisfactory residential environment".</p> <p><u>Edinburgh World Heritage (0339)</u></p> <p>Consider policy to be important policy in light of changing use patterns and while care must be taken not to erode historic character through inappropriate change in use, there are a number of areas in the city which have lost their historic residential use and would benefit from re- introducing and strengthening residential communities.</p>				



#### HCPII Properties 101LP (0517)

Support policy however, with reference to Hou 5 (c), consider more clarity should be included on what “appropriate” open space, amenity and parking standards would be as often there are site-specific constraints which prevent the conversion from achieving the same design standards as new build residential development.

Consider that more flexible design standards in terms of issues such as open space, dual aspect, and amenity space should be included within the wording of the policy.

#### Leith Central Community Council (0614)

Should not suggest that a conversion to residential use should be supported where the shop unit has been vacant for a significant period of time and been actively marketed as this can encourage developments with badly located shop units to be naturally turned into flats after a very short period of time.

#### Melford Developments Ltd (0308)

Consider that Hou 5 (d) is too wide ranging and unspecific and should be removed or made much more specific. Query why it is necessary in addition to a, b and c. Consider a specific time period is needed to keep the policy consistent for all proposals and asks what form of marketing would be acceptable. Considers that at Para 3.184 'significant period' needs to be defined and suggest 12 months.

### **Hou 7 Loss of Housing**

#### Deirdre Henderson (0727)-support

Support policy. Residents need affordable and accessible homes and communities need long term neighbours to ensure safety and reduce poverty and isolation / loneliness.

#### Airbnb (0474)

Consider policy will bring about a blanket ban on short-term letting and strongly object to this. Would impact on jobs and income, would not increase number of available homes and would be damaging to tourism.

Supporting documents do not consider economic consequences, policy is not clear as to whether it applies to permanent changes of use or to any change of use, it is disproportionate and should instead set criteria for when and where short-term letting would be supported. May be justification for introducing more stringent policy controls for permanent changes of use in the City Centre.

Where evidence that use of properties for short-term letting is responsible for housing shortages and where evidence suggests restrictions would address policy goals, believe it is appropriate to enforce planning permission on professional operators. However, concerned that the Council has not produced evidence that short-term letting of properties does have a widespread impact across every City ward in Edinburgh.

#### Christopher Brown (0378)

Comments that the use of residential properties for short-term lets, student accommodation and conversion to HMO is destroying previously thriving communities and considers this to drive demand for new homes and push families further from the centre of the city, putting additional strain on transport infrastructure.

Cockburn Association (0777)

Welcome and support policy however, advocate a policy statement in enforcement in areas of significant short-term let concentrations which have no consent and policy should comment on the proposed short-term let control area.

Cramond & Barnton Community Council (0243)

Should be more explicit as to what restrictions will be placed on short-term lets and how these will be implemented. Should identify proposed short-term let control areas or indicate that the entire city will be a short-term let control area as without such clarity and firm implementation will fail to stem the continuing loss of housing stock to short-term lets.

Edinburgh World Heritage (0339)

Fully support principle of policy, and in particular the presumption against loss of housing to short-term lets. Assume that follow-up policies and guidance provide sufficient clarity and criteria for the regulation of short-term lets.

Leith Central Community Council (0614)

Wish to see policy explicitly limit use of residential properties for short-term lets to prevent loss of homes, limit the effect of transient populations and dilution of resident population. Policy should require monitoring of capacity, units and footprint dedicated to tourist populations to identify negative impacts.

Melford Developments Ltd (0308)

Consider policy is overly restrictive and unworkable and will, in combination with other policies, restrict the scope for beneficial development. Other criteria must apply relating to the effective use of land or buildings within the urban area. Not clear why such a development should provide necessary community facilities which are undefined in any case and not clear how this relates to integrated neighbourhoods or Policy Inf 1 Community Facilities, object to this requirement.

Mrs Patricia Stott (0349)

Appears to address issues connected with short-term lets and should be clearer as to objectives and how it would be implemented.

New Town & Broughton Community Council (0254)

Unclear if this policy is necessary, given the other separate national legislative changes regarding short-term lets. Concerned prescriptive policy may prevent some change of

uses which would be beneficial and may preclude some change of use in city centre locations which are fully in accord with the principle of 20 minute neighbourhoods.

Policy should be amended to be more specific regarding short-term lets with a policy statement covering enforcement in areas of significant concentrations, include the proposed short-term let control area and outline a policy-basis for considering change of use applications associated with it.

Philip Endecott (0079)

Would like to see more long-term residents but believe focus of attention on holiday lets is misdirected. Filling empty properties would make difference and consider worst possible outcome would be for currently holiday lets to become student flats.

Does not seem to be the case that demand from holiday lets has driven up prices driving residents elsewhere. Do not support council guidance which suggests that tenement stair flats are unsuitable for holiday lets, while main door ground floor flats could be allowed as more disturbance may be created, main door ground floor flats have private gardens more suited to permanent residents and are accessible to wheelchair users.

Shelagh Sharp (0111)

Would like to see a stricter control of short-term lets and the same safety requirements, such as smoke detectors, occupancy limits etc, should apply to short-term lets as to long term lets.

Southside Community Council (0781)

Strongly supports policy with regard to refusing proposals for change of use to short-term lets however "exceptional circumstances, where it would provide necessary community facilities without loss of amenity of neighbouring residents" could never apply to applications for short-term lets and the policy should be amended to clarify this matter.

Terry Levinthal (0313)

Support policy, but para 3.190 should make reference to tenements and common stairs, indicating that commercial short-term let businesses are generally inappropriate in tenements if accessed from the common stair, reflecting current practice of the Council.

Toby Subiotto (0580)

Support policy in principle, however, consider that the Council itself is not adhering to its implementation. Suggests consideration should be given to wider policies such as HMO licensing, and how to retain young families in the city, and not just development. Consider that there is an oversupply of HMOs and student housing which does not match with statements at para 3.191.

## **Hou 8 Inappropriate uses in Residential Areas**

New Town & Broughton Community Council (0254)-support

Support policy, reflecting the intent of the policy in the existing LDP Hou 7 which provides protection for residents in already densely populated areas preventing any further deterioration in living conditions in more mixed-use areas which nevertheless have important residential functions.

Andy Agnew (0562)

Considers that new housing developments should include details of acceptable level of housing that can be used for short-term lets and there should be a monitoring of compliance with the regulations.

Cockburn Association (0777)

Welcome policy and its intention. Advocate retention of the policy statement in the existing LDP Hou 7 which states, "the intention of the policy is firstly, to preclude the introduction or intensification of non-residential uses incompatible with predominantly residential areas and secondly, to prevent any further deterioration in living conditions in more mixed-use areas which nevertheless have important residential functions."

Cramond & Barnton Community Council (0243)

Hou 8 refers to issues connected with short-term lets and should be more explicit as to what restrictions will be placed on short term lets and how these will be implemented.

Mrs Patricia Stott (0349)

Hou 8 appears to address issues connected with short-term lets and should be clearer as to objectives and how it would be implemented.

Philip Endecott (0079)

Aspirational objective, which has been present in previous plans, is worthless unless enforced.

Terry Levinthal (0313)

Considers it essential that policy is properly assessed in planning applications and requests clarification of "deterioration in living conditions" in guidance.

**Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Consider policy should include requirements for access to education and health facilities, as well as access to public transport, shops, open spaces, recreational amenities etc. as for permanent residents. Long-standing need for sites was identified by SESplan and it was anticipated that local authorities would make the necessary provision. The extent of demand for this provision should be assessed, and suitable sites provided.

SEPA (0012)

Do not support policy. Consider policy is framed in a negative way and may discriminate against people living in these sites. Assumes sites are problematic and makes no attempt to integrate them in a community setting or provide them with equal access to amenities. Sites can generate waste which is fly-tipped and have inadequate waste-water drainage facilities because sites are in areas without access to public water supplies and the public sewer and can be in areas of flood risk. Believe policy is inconsistent with the aims of the for equality and inclusivity and needs to be re-considered and re-written.

Ask if “Gypsies, Travellers and Travelling Showpeople” is a description chosen by the residents to which it refers and if not, the terms chosen by them should be used as the description for this policy.

## **Additional Policies**

### **Housing for Older People**

#### Calex Group Ltd (0556)

Consider there is an absence of specific policies for distinct housing requirements of the elderly as expected by Planning Act and specific policy is required. Should be based upon on a robust evidence base that identifies the housing requirements of specialist housing for older people. Should set out clear policy to address housing needs for older people on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need. Should set indicative figures or a range for the number of specialist housing for older people needed across the Plan area throughout the Plan period and this must recognise the diverse models that exist. Should monitor delivery of housing for older people and deliver action plans to address under provision.

Should consider the inclusion of specialist housing for older people within appropriate strategic or other site allocations subject to consideration of need, site and locational factors and deliverability. Should recognise the significant benefits associated with specialist housing for older people.

Should set different policy requirements, for example, affordable housing, for an integrated retirement community (Class 8 use) compared to residential development (Class 9 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g., integrated retirement communities provide significant levels of communal facilities/non-saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

#### Esk Property LLP (0726)

Note that there are no specific policies that refer specifically to age-restricted housing or similar uses and consider this is an oversight. Consider it is inappropriate to assess new age restricted development proposals against mainstream residential policies given the clear differences in planning considerations and locational requirements between the two uses. Suggest a new policy is introduced offering support to age-restricted residential and

social care uses on appropriate sites. Consider this could include green belt or countryside locations which could accommodate low density development with large amounts of open space.

Glenmorrison Group (0600)

Plan does not meet duty set out in the 2019 Town and Country Planning (Scotland) Act and in the national guidance to make strategic provision for elderly living.

NPF4 identifies the provision of housing for the elderly and Outcome Statements refer to meeting the housing needs for older people and the ability to age in place.

**Other**

Cramond and Barnton Community Council (0243)

Risk that speculative developers may 'create' brownfield sites to influence planning decisions in favour of development request an additional policy to prevent such actions with the specific intention of creating brownfield sites.

**Modifications sought by those submitting representations:**

**Hou 5 Conversion to Housing**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Include minimum unit size in policy.

Barratt David Wilson Homes (0677), Homes for Scotland (0404), Wright PDL (0078)

Include detail on what constitutes a satisfactory residential environment.

Edinburgh World Heritage (0339)

Amend Hou 5 (b) to:

"...housing would be compatible with nearby uses and the character of any heritage assets"

Amend paragraph 3.184 to: "...which are supported by this plan. It further has the opportunity to return historic residential character to areas which have lost this due to conversion, and support community and cultural resilience. Policy Re 4..."

HCPII Properties 101LP (0517)

Include within the wording of the policy more flexible design standards in terms of issues such as open space, dual aspect, and amenity space.

Leith Central Community Council (0614)

Remove last sentence from paragraph 3.184.

Melford Developments Ltd (0308)

Define 'significant period' at paragraph 3.184 and suggest 12 months.

**Hou 7 Loss of Housing**

Airbnb (0474)

Remove policy and replace with a statement indicating the Council's intention to introduce a criteria based policy on short-term lets once it has undertaken a proper analysis of all of the factors listed in Supporting Submission Airbnb Response: City Plan 2030.

Christopher Brown (0378)

No change suggested

Cockburn Association (0777)

Include a policy statement in enforcement in areas of significant short-term let concentrations which have no consent.

Include comment in policy on proposed short-term let control area.

Cramond & Barnton Community Council (0243)

Extended policy to refer in more detail to the Council's short-term lets policies and state precisely how, when and where these will be implemented.

Edinburgh World Heritage (0339)

No modification specified.

Leith Central Community Council (0614)

Include within policy limit on use of residential properties for short-term lets.

Include in policy requirement for monitoring of capacity (headcount), units and footprint dedicated to tourist populations to enable early detection of negative impact on the availability of permanent residential units and skewed demand (towards transient population needs) at local shops.

New Town & Broughton Community Council (0254)

Amend policy to be more specific regarding short-term lets – with a policy statement covering enforcement in areas of significant short-term let concentrations and include the proposed short-term let control area and outline a policy-basis for considering change of use applications associated with it.

Shelagh Sharp (0111)

No modification specified but implies there should be a stricter policy on short-term lets.

Terry Levinthal (0313)

Expand paragraph 3.190 to make reference to tenements and common stairs, indicating that commercial sort-term let businesses are generally inappropriate in tenements if accessed from common stair.

Melford Developments Ltd (0308)

Remove policy Hou 7.

Mrs Patricia Stott (0349)

Make clear in policy what the objectives are and how it would be implemented.

Philip Endecott (0079)

Include commitment in policy to working to make the neighbourhoods more attractive to permanent residents and focus equally on all other non-permanent-residential uses including empty properties and student flats.

Southside Community Council (0781)

Amend policy to clarify that “exceptional circumstances, where it would provide necessary community facilities without loss of amenity of neighbouring residents” could never apply to applications for short-term lets.

Toby Subiotto (0580)

Suggests consideration should be given to wider policies such as HMO licensing, and how to retain young families in the city, and not just development.

**Hou 8 Inappropriate Uses in Residential Areas**

Andy Agnew (0562)

Infers that new housing developments should include details of acceptable level of housing that can be used for short-term lets and there should be a monitoring of compliance with the regulations.

Cockburn Association (0777)

Retain policy statement in the existing LDP Hou 7 which states, “ the intention of the policy is firstly, to preclude the introduction or intensification of non-residential uses incompatible with predominantly residential areas and secondly, to prevent any further deterioration in living conditions in more mixed-use areas which nevertheless have important residential functions.”

Cramond & Barnton Community Council (0243), Mrs Patricia Stott (0349)



Extended policy to refer in more detail to the Council's short term lets policies and state precisely how, when and where these will be implemented.

Philip Endecott (0079)

No modification specified

Terry Levinthal (0313)

No modification specified but suggests provision of guidance.

### **Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Include requirement for access to education and health facilities, access to public transport, shops, open spaces, recreational amenities.

Assess demand and provide suitable sites.

SEPA (0012)

Re-write policy to include access to amenities.

Change title of policy.

### **Housing for Older People**

Calex Group Ltd (0556)

Include a specific policy to cater for the distinct housing requirements of the elderly based on the following criteria;

1. Be based on a clear understanding of specialist housing for older people drawing upon national guidance and other sources, particularly regarding the use class and recognise the different types of specialist housing which exist.
2. Be based on a robust evidence base that identifies the housing requirements of specialist housing for older people drawing upon appropriate sources recognised within the sector.
3. Set out clear and specific policy / policies to address housing needs for older people (e.g. integrated retirement communities and extra care), on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need.
4. Set indicative figures or a range for the number of specialist housing for older people needed across the Plan area throughout the Plan period and this must recognise the diverse models that exist.
5. Monitor the delivery of housing for older people and deliver action plans to address under provision.

6. Consider the inclusion of specialist housing for older people within appropriate strategic or other site allocations subject to consideration of need, site and locational factors and deliverability.

7. Recognise the significant benefits associated with specialist housing for older people and this can inform planning decision making.

8. Set out different policy requirements, for example, affordable housing, for an integrated retirement community (Class 8 use) compared to residential development (Class 9 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g. integrated retirement communities provide significant levels of communal facilities/non-saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

#### Esk Property LLP (0726)

Include a new policy offering support to age-restricted residential and social care uses on appropriate sites.

#### Glenmorrison Group (0600)

Insert a new policy after Hou 3:

“Housing for Older People

'Developments for specific formats of residential facilities to make provision for older people and elderly care will be permitted subject to impact on landscape character and all other environmental and design impacts according to other relevant policies in this plan. The planning authority will report to Scottish Ministers every two years on how the planning system is operating in the city to make provision for the housing needs of older people.’

#### **Other**

#### Cramond & Barnton Community Council (0243)

Include a specific policy aimed at deterring the deliberate creation of brownfield conditions by speculative developers with the intention of seeking development on greenfield sites.

### **Summary of responses (including reasons) by planning authority:**

#### **Hou 5 Conversion to Housing**

#### Edinburgh World Heritage (0339)

It is not considered necessary to amend Hou 5 (b) to include compatibility with heritage assets. The Plan should be read as a whole and policies Env 9-Env 17 of the Plan set out policies to protect the historic environment. **No modification proposed.**

It is not considered necessary to include the suggested sentence in paragraph 3.184 of the plan. Paragraph 3.184 as existing states that conversion of existing buildings can help

create high-density mixed use environments. The text as set out is preferable as it highlights the opportunity to create a mix of uses which is supported by the plan. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003), Barratt David Wilson Homes (0677), Homes for Scotland (0404), Wright PDL (0078)

Policy Hou 5 sets out a requirement for conversion to residential use to provide a satisfactory residential environment. Hou 5 (b) requires that appropriate amenity standards are met. Policy Env 33 addresses amenity and Edinburgh's Design Guidance (CD047) provide further information. The Council's non-statutory Guidance for Businesses sets out guidance in relation to achieving a satisfactory residential environment. It sets out minimum requirements for dwelling sizes. It is considered appropriate that this level of detail is contained within guidance rather than policy. **No modification proposed.**

Leith Central Community Council (0614)

Conversion of existing buildings can make a contribution to housing provision and support the aim of the Plan to create high-density mixed use environments. To safeguard shop units for shopping and small business use Policy Re 4 and Re 5 presume against the conversion to housing within town centres and local centres. Outwith these locations Policy Re 8 sets policy for the determination of applications for the change of shop units. Paragraph 3.184 sets out that such a conversion, if it were to residential use, could be supported where the shop unit has been vacant for a significant period of time, and actively marketed, where there is a local need and demand for a range of housing types and for town centre living. It is suggested that this provides a loophole for developments to intentionally locate shop units in a location which is not desirable to occupiers with the intention that they can then be easily converted into residential use after a short time. Paragraph 3.184 states that the unit should be vacant for a significant period of time. This support is considered to be appropriate to provide additional housing where other uses have not come forward. **No modification proposed.**

HCPII Properties 101LP (0517)

Policies within the Plan address amenity, open space and private car parking for development which would include change of use. It is not necessary to replicate these policies within the wording of Hou 5 as the Plan should be read as a whole. The Council's non-statutory Guidance for Businesses (CD050) sets out the criteria to be met by Policy Hou 5 where there are proposals to convert to residential use. Daylighting requirements are set out in the Council's Edinburgh Design Guidance (CD047). It is not considered appropriate or necessary to set out the design standards within the plan. Any flexibility in design standards would be a matter for the planning application process which allows for material considerations to be taken into account on a case by case basis. **No modification proposed.**

Melford Developments Ltd (0308)

There is no standard definition of a significant period of vacancy. The policy allows for flexibility depending on the individual circumstances. **No modification proposed.**

## Hou 7 Loss of Housing

### Airbnb (0474)

It is not considered that Hou 7 prohibits short-term lets. Policies in the Plan can only be applied in circumstances where planning permission is required. The whole of Edinburgh was designated as a Short-term Let Control Area on 5 September 2022 requiring permission for change of use of dwellings to secondary letting however home-sharing and home letting may not require planning permission. It is not role of the Plan to set out when planning permission is required but to set out the policy which will apply in such circumstances.

The Plan is required to set policy. It would not be appropriate to set out the intention to develop policy at a future date. The policy aims to retain existing dwellings and protect amenity of residents. It presumes against loss of residential dwellings for these reasons therefore a criterion based policy would not be appropriate.

The need to control short-term letting in Edinburgh has been explored and established through the designation of the whole of Edinburgh as a Short-term Let Control Area. The impact of loss of dwellings to short-term lets is explored in the Designation of Short-Term Let Control Area for Edinburgh Statement of Reasons Background Report, February 2022 (CD059). Available evidence indicates that the use of dwellings for short-term letting is impacting upon the housing market. Scottish Government in approving the short-term let control area considered that the designation was reasonable. It is not desirable to set less stringent policy on loss of housing within certain parts of the city as this could have a knock on effect into other areas.

Development Plan policy is applied at the time of application. Its effect is therefore upon future proposals. Any economic impact of future growth of short-term lets within residential dwellings must be balanced against the aim of the Plan to protect the availability of housing and protect residential amenity. The Plan recognises tourism is a key sector in the city's economy and that maintaining and developing it relies upon sufficient provision of high quality tourist accommodation. Policy Econ 6 supports hotel development in appropriate locations.

It is suggested that the Plan should state if the policy applies only to permanent change of use. It is not necessary or appropriate to refer to the length of time to which any consent might apply. This a matter for the planning application process. **No modification proposed.**

### Christopher Brown (0378)

Policy Hou 7 aims to retain housing by presuming against change of use of dwellings to other uses including short-term lets. Policy Hou 8 controls Houses in Multiple Occupation and Policy Hou 6 aims to ensure that student accommodation is delivered at the right scale and locations to provide balance. **No modification proposed.**

### Cockburn Association (0777)

It is not the purpose of the Plan to set out enforcement policy. Planning Enforcement powers are set out in the Town and Country Planning (Scotland) Act 1997 (CD101) and

the Council's Planning Enforcement Charter December 2021 (CD078) explains the purpose of the Council's planning enforcement service, the process for handling enquiries, and sets out the standards of service. Since publication of the proposed plan the whole of the City of Edinburgh Council area has been designated as a short-term let control area. This requires that planning permission is sought for change of use of a dwelling to secondary letting. It is not role of the Plan to set out when planning permission is required but to set out the policy which will apply in such circumstances. The control area designation is open to review and for this reason it would not be appropriate to refer to it within the policy text. **No modification proposed.**

#### Cramond & Barnton Community Council (0243)

The City of Edinburgh Council designated the whole of the council area as a Short-Term Let Control Area on 5 September 2022. The control area is designated under the Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 (CD104). It is not appropriate to set out this designation in the plan. The Plan sets policy which will be applied not when planning permission will be required. The control area is open to review within the period of the plan.

Policy Hou 7 applies to a change of a dwelling to any other use including short-term lets. It is not specific to short-term lets as it is recognised that any change of use may impact on availability of housing and on existing residents. The Council's non-statutory Guidance for Businesses (CD050) sets out further detail on the implementation of the policy for change of use to short-term letting and will be reviewed and updated accordingly. **No modification proposed.**

#### Edinburgh World Heritage (0339)

The Council's non-statutory Guidance for Businesses (CD050) sets out guidance on short-term lets and is subject to regular review. A general policy with specific guidance is considered to be appropriate. **No modification proposed.**

#### New Town & Broughton Community Council (0254)

Legislative changes introduced by the Short-term Let Control area regulations do not set policy to be applied to short-term lets. It is therefore necessary to include the policy in the Plan which will be applied to all changes of use from residential including to use as a short-term let. The policy would not prevent changes of use which would be beneficial, it allows for change of use where it would provide necessary community facilities.

Policy Hou 7 applies to the loss of residential dwellings to any use. It is not a specific short-term let policy. Short-term lets are only one use which results in loss of housing, and it is appropriate to have a general policy. The Council's non-statutory Guidance for Businesses (CD050) sets out guidance on short-term lets and is subject to regular review. A general policy with specific guidance is considered to be appropriate. **No modification proposed.**

#### Leith Central Community Council (0614)

Where planning permission is required policy Hou 7 presumes against a change of use of a dwelling to a short-term let. It is therefore considered sufficient to prevent loss of homes

as far as possible. A requirement for the suggested monitoring would not be appropriate in the plan. Future local development plans will be accompanied by an Evidence Report which provides an appropriate means of monitoring policies within the Plan. **No modification proposed.**

Melford Developments Ltd (0308)

The policy aims to retain existing dwellings and protect amenity of residents. It presumes against loss of residential dwellings for these reasons however the policy does not prevent changes of use which would be beneficial, it allows for change of use where it would provide necessary community facilities. This allows for circumstances where the benefits of the proposed use would outweigh the loss of a dwelling as it was providing a use required in a community. Community facilities is defined within the Plan Glossary. It is defined as facilities and uses that are required and widely used by all and foster a vibrant community. Examples are provided. Inf 1 sets out requirements for housing developments to have access to community facilities while Hou 7 reference relates to the use of the proposal. **No modification proposed.**

Mrs Patricia Stott (0349)

The objective of the policy to retain existing dwellings as a means of meeting housing need is set out in paragraph 3.190 of the plan. The Council's non-statutory Guidance for Businesses (CD050) sets out further detail on the implementation of the policy for change of use to short-term letting and will be reviewed and updated accordingly. This is considered to be appropriate. **No modification proposed.**

Philip Endecott (0079)

Policy Hou 7 applies to all changes of use of dwellings not just to short-term lets. As set out in paragraph 3.190 of the Plan there has been an increase in short term letting in Edinburgh and the Designation of Short-Term Let Control Area for Edinburgh Statement of Reasons Background Report, February 2022 (CD059) identifies impacts of this on housing. It is therefore considered appropriate to specifically refer to short-term lets within the policy.

Policy Hou 8 Inappropriate uses in residential areas would apply to planning applications for Houses in Multiple Occupation which would apply to many properties occupied by students thereby ensuring that they do not have a detrimental effect.

The policy as set out is considered to ensure residential areas are maintained and therefore attractive and available to permanent residents therefore no further commitment is necessary within the policy.

Student housing is controlled through Policy Hou 6. It is not considered necessary to refer to this in Policy Hou7 as the Plan should be read as a whole. Policy Hou1 supports housing in the urban area which would allow for empty properties to be converted to housing. **No modification proposed.**

Shelagh Sharp (0111)

Safety requirements for short-term lets are outwith the scope of the plan. Policy Hou 7 controls change of use of dwellings to short-term lets. It presumes against such a change unless there are exceptional circumstances. It therefore does provide a strong policy. **No modification proposed.**

Southside Community Council (0781)

Community facilities is defined within the Plan Glossary. It is defined as facilities and uses that are required and widely used by all and foster a vibrant community. Examples are provided schools, community centres, GP surgeries, dentists, local shops and amenities. The definition would clearly not include use as a short-term let. It is not considered necessary to state this within the policy. **No modification proposed.**

Terry Levinthal (0313)

The level of detail suggested for inclusion is considered to be more appropriate for guidance rather than inclusion in the plan. The Council's non- statutory Guidance for Businesses (CD050) sets out the approach to change of use in flatted properties. **No modification proposed.**

Toby Subiotto (0580)

Houses of Multiple Occupation (HMO) licencing is outwith the scope of the plan. HMOs are controlled in planning at the point at which there is considered to be a material change of use. Policy Hou 8 Inappropriate Uses in Residential Areas allows for assessment of planning applications in such situations.

The Plan allocates sites for housing within the urban area. To provide for families Policy Hou 3 Mixed Communities requires a mix of housing types and sizes, and that developments of 2 or more units provide a minimum of 20% of units suitable for large families. Policy Hou 6 supports purpose-built student accommodation and ensures that it is balanced with the needs of existing communities. **No modification proposed.**

**Hou 8 Inappropriate Uses in Residential areas**

Andy Agnew (0562)

Licensing regulations for short-term lets are subject to a separate legislative regime and are not within the scope of the development plan. Policy Hou 7 would apply to a change of use from a dwelling to a short-term let. Where new housing is developed any use change of use of this would be assessed against Policy Hou 7 and Hou 8 and other relevant policies in the plan. A development of short-term lets would be considered under Policy Econ 2 Commercial Development. **No modification proposed.**

Cockburn Association (0777)

Policy Hou 8 paragraph 3.192 retains the wording of current LDP Policy Hou 7 supporting text except for the word firstly. This is considered superfluous and re-introducing this word would not change the policy or its objective. **No modification proposed.**

Mrs Patricia Stott (0349), Cramond & Barnton Community Council (0243)

Policy Hou 8 paragraph 3.192 is quite clear of the intention of the policy. Policy Hou 8 is unchanged from current LDP Policy Hou7. The Council's non-statutory Guidance for Businesses (CD050) sets out guidance on the application of LDP Policy Hou 7 and will be updated as appropriate. **No modification proposed.**

Philip Endecott (0079)

Comment noted. **No modification proposed.**

Terry Levinthal (0313)

Policy Hou 8 is unchanged from current LDP Policy Hou7. The Council's non-statutory Guidance for Businesses (CD050) sets out guidance on the application of LDP Policy Hou 7 and will be updated as appropriate. **No modification proposed.**

### **Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Paragraph 133 of SPP 2014 states local development plans should identify suitable sites for Gypsy/Travellers and Travelling Showpeople if there is a need. The Council acknowledge that draft NPF4 (CD099) requires that land should be allocated ensure provision of accommodation for Gypsy/Travellers and Travelling Showpeople and the location of where new homes are allocated should be consistent with the principles of 20 minute neighbourhoods and an infrastructure-first approach. In producing HND A2 (CD094) the SESplan Core Housing Market Partnership considered that there was a lack of up to date information and data relating to Gypsy/Travellers and their accommodation needs nationally making it difficult to assess housing need. In the absence of any demonstration of need the City Plan Policy Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople provides flexibility to deal with any evidence which may emerge during the lifetime of the plan.

The nature and requirements of occupants of housing and sites for gypsies, travellers and travelling show people are different and it would not be appropriate to apply the same requirements as housing. **No modification proposed.**

SEPA (0012)

The nature and requirements of occupants of housing and sites for gypsy/travellers and travelling show people are different and it would not be appropriate to apply the same requirements as housing. Policy is supportive of development of sites and sets a criteria base policy. As such it forms a straightforward set of criteria to assess applications, makes explicit the consideration of individual merits, and does not try to apply a homogeneous approach to site developments. Hou 9 (d) requires that the site can be provided with essential services. While not exact replication of the term used in Scottish Planning Policy (CD096) and draft NPF4 (CD099) the term gypsies, travellers and travelling showpeople used within Hou 9 is considered to have the same meaning and reflects national policy. **No modification proposed.**

### **Housing for Elderly**



Calex Group Ltd (0556), Esk Property LLP (0726), Glenmorrison Group (0600)

Housing need is addressed at Issue 19 Housing Supply Target and Land Requirement. It is not agreed that a separate policy is required for housing for older people. Support is provided for housing for older people in Policy Hou 3 which requires a mix of housing to meets the differing needs of residents including older people. Paragraph 3.180 requires an inclusive approach to the design of all housing. Guidance is provided in the Council's non-statutory Edinburgh Design Guidance (CD047). This supports the Scottish Government's Housing for Varying Needs standards which set out good practice on the design of housing to achieve flexibility and suitability for people of all abilities.

Where housing is proposed it is appropriate that this is assessed against the relevant housing policies of the Plan regardless of the age of occupier. The requirements of the development plan should be taken into account in negotiations. Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101), allows for material considerations, including viability, to be considered on a case-by-case basis. **No modification proposed.**

Esk Property LLP (0726), Glenmorrison Group (0600)

It is not accepted that housing for older people would require a green belt or countryside location to provide for appropriate open space. Policy Hou 1 sets the locations where housing development is supported which includes a range of greenfield and brownfield sites. **No modification proposed.**

Glenmorrison Group (0600)

The duty set by the Planning Act 2019(CD102) to report to Parliament on the housing needs of older people is placed upon Scottish Ministers. While Planning Authorities are required to be consulted upon this there is currently no reporting process. As the requirement is set out in legislation and applies to Scottish Ministers it is not accepted that reference to this should be included within the plan. **No modification**

Spire Healthcare Limited (0719)

The Plan aims to direct development to and maximise the use of brownfield land rather than greenfield land. Part 4, Table 2 Housing Proposals identifies allocated sites which combined with existing land supply will meet the housing supply target. Policy Hou 1 supports development on allocated sites and other sites within the urban area. Land supply is addressed in Issue 20 Assessment of Housing Land Supply. It is not necessary to allow for development on greenfield land. Policy Hou 3 aims to provide a range of housing for differing needs, including older people within each development to provide for multi-generational communities. It is not necessary to refer to each policy within the aims of the plan. **No modification proposed.**

**Other**

Cramond and Barnton Community Council

Policy Hou 1 supports housing development on allocated sites, other sites within the urban area and as part of redevelopment proposals in commercial centres. The proposals map

identifies the urban area and areas of countryside and green belt. Policy Env 18 controls development in the green belt and countryside. It is not necessary to provide policy for the circumstances described to prevent the creation of a brownfield site. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 27	Infrastructure Delivery and Developer Contributions	
Development plan reference:	Policy Inf 3 Infrastructure Delivery and Developer Contributions	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Archie Clark (0003)</div><div>AREAA (0358)</div><div>Barratt David Wilson Homes (0677)</div><div>Brian Grange (0042)</div><div>CALA Management Ltd (0465)</div><div>Cramond &amp; Barnton Community Council (0243)</div><div>Crosswind Developments Ltd (0184)</div><div>Genna Spears (0081)</div><div>Hallam Land Management (0599)</div><div>Helen Forrest (0315)</div><div>Homes for Scotland (0404)</div><div>Ian R N Stewart (0131)</div><div>Juniper Green &amp; Baberton Mains Community Council (0306)</div></div><div><div>Lynn Grattage (0362)</div><div>Melford Developments Ltd (0308)</div><div>Miller Homes Limited (0649)</div><div>Newcraighall LLP (0466)</div><div><u>NHS Lothian (0596)</u></div><div>Roderick Alexander (0454)</div><div>Steve Loomes (0767)</div><div>Stirling Developments Limited (0303)</div><div>Susie Ross (0440)</div><div>Tessa Haring (0112)</div><div>University of Edinburgh (0464)</div><div>Roseberry Estate (0618)</div><div>Wright PDL (0078)</div></div></div>		
Provision of the development plan to which the issue relates:	Relates to Policy Inf3 which supports development where there is sufficient infrastructure or where not proposals will be required to deliver or contribute towards provision of infrastructure.	
Planning authority's summary of the representation(s):		
<div><div>Delivery of Infrastructure</div><div><div><u>Hallam Land Management (0599), Miller Homes Limited (0649)</u></div><div><p>The Action Programme sets out a number of infrastructure requirements, but does not actually set out the actions required to deliver these or the Council's proposed development plan strategy as a whole. There is a lack of relationship in the Action Programme between the proposed development and infrastructure requirements. There is also limited information on the associated costs of these actions, how they will be funded or when they are expected to be delivered.</p><p>The Proposed LDP does not include any programme for the delivery of the development plan strategy, which is reflected in the Action Programme. In particular, there is no information provided in the Action Programme how the Council intends to bring forward specific brownfield sites for development, address ownership issues or the various constraints associated with brownfield development. It is unclear whether the Council's development strategy is deliverable.</p></div></div></div>		

Section 10 of the Proposed Action Programme is expected to set out the healthcare infrastructure actions required to support the development strategy set out in the Proposed LDP. However, no specific actions are stated. Some general references are made to new practices and expansions in the Healthcare Infrastructure Requirements column, however, the size of any new premises is not stated, nor an indication of the costs. It also does not state where the mitigation will be provided and no timescales are provided for the delivery of any actions. It is therefore unclear how these unspecific actions relate to the delivery of the Proposed LDP development strategy.

It is also not possible to demonstrate that the relationship and scale and kind tests of Circular 3/2012 can be met in any planning obligation for healthcare infrastructure based on this Action Programme.

Section 26 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 and paragraph 130 of Circular 6/2013 Development Planning lists the content that Action Programmes must include. These state that Action Programmes should include: a list of actions required to deliver each of the plan's policies and proposals; the name of the person who is to carry out the action; and the timescale for carrying out each action.

The Action Programme does not detail what actions are required, or the timescale for carrying out these actions. It also does not specify the person that will carry out the actions, stating that this is ...to be confirmed. It therefore does not meet the minimum requirements for an Action Programme with regard to infrastructure requirements, as set out in Circular 6/2013 and the 2008 Regulations.

### **Inf 3 Infrastructure Delivery and Developer Contributions**

#### Newcraighall LLP (0466)

Object to CEC taking forward their approach of seeking developer contributions to healthcare infrastructure. The Infrastructure and Transport Policy Inf 3 Infrastructure Delivery and Developer Contributions should be amended.

Object to the specific reference in Place 32 Newcraighall stating that Newcraighall East is to, 'h. Provide or contribute towards education, and healthcare infrastructure and community facilities.' The Council's response is set out in Issues 4-8 Individual Sites.

The principle of Policy Inf 3 Infrastructure Delivery and Developer Contributions is supported whereby, 'Development will be supported where there is sufficient infrastructure capacity already being available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts' in accordance with the relevant legislative and statutory policies and guidance.

It is unclear what is meant however where Policy Inf 3 continues to state that, 'Where, by the nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions will be sought.' The nature of the infrastructure should be defined, and if it cannot be delivered by the developer directly, it should be clarified how developer contributions are to be sought.

Object to the principle of development providing or contributing towards healthcare

infrastructure. Healthcare infrastructure (such as GP services) is currently not an issue (either legally or financially) that can be addressed by the planning system. Any developer contributions must be imposed according to the tests set out in the relevant Scottish Government Circular. Healthcare requirements must form part of a wider NHS forward programme. The NHS operate a 'list system' which allocates a certain number of registered patients per GP. If a GP has too many patients registered, then funding is available for a new GP as part of that practices business case to expand services where required to meet additional demand. The funding of healthcare is an issue for central government. GP practices are often run as individual businesses who make a business case to expand and establish the practices if they seek to do so. The decision therefore to allocate funding to GP practices is a matter for central government in line with the business cases presented to them.

Recommended amendments to Part 3: Infrastructure and Transport Policies Inf 3  
Infrastructure Delivery and Developer Contributions Proposed City Plan 2030.

Barratt David Wilson Homes (0677), Steve Loomes (0767)

BDW would ask that the Council provides clear evidence that developer obligations in respect of healthcare contributions are proven to be required.

Homes for Scotland (0404), Wright PDL (0078), Steven Loomes (0767)

The Council has previously lost an appeal in West Edinburgh on healthcare contributions (DPEA Ref: PPA-230-2207), wherein it was determined that a lack of information had been put forward by the Council to justify the assumption of the volume of new patients the Council had claimed there would be. The Council requires to evidence clearly that developer obligations in respect of healthcare contributions are proven to be required. The decision on the last Supplementary Guidance (letter sent 17 January 2020 – attached as an additional document herein) also questioned the validity of the contribution zones the Council had used – nothing has changed.

Home builders and other delivery partners need clarity at the Plan stage on what infrastructure will be expected to be provided through new development. Any developer obligations related to infrastructure requirements must be properly justified having regard to policy. They should be able to be viably delivered.

As well as satisfying the policy tests, it will be important that the Council has a clear awareness of and strategy for any land assembly work required for the delivery of the desired infrastructure, so it avoids a situation where the delivery of early phases of large sites is stalled because all of the land necessary for a such connections is not in the applicant's or the Council's control. The Council also needs to be aware of the realistic costs and timeframe of this process.

We consider that issues such as education, transport and other infrastructure need to be led by expert advice and evidence.

There are concerns that, with regards to education, the Council appears to have adopted the same approach to contributions as the previous guidance, which Ministers rejected.

Developer contributions for education and healthcare must be justified. The proposed

approach is not justified in this case. A clear link between the development and what is claimed to be needed is required to be established. A clear link has not been established in this case.

Has the Council considered the impact of cumulative costs? Is there a commitment to closing potential funding gaps (e.g., NHS Lothian)?

Contributions need to be fairly and reasonably related to what is proposed and must be necessary for the development to proceed. It will be important that the Council avoids a situation where the delivery of early phases of large sites are stalled because all the land necessary for such connections is not in the applicants control.

New development can and should only contribute to what is fairly and reasonably related to the development which is proposed as established in Circular 3/2012 and the Elsie Supreme Court judgement ([2017] UKSC 66). It will be necessary to support a phased approach to provision so requirements do not prevent the delivery of larger sites where early phases can be delivered. It will also be essential that those preparing place briefs involve developers, fully understand land ownership and take a pragmatic, delivery focused approach.

It is important that policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks creates uncertainty and adds complexity and risk to the planning application process.

Tessa Haring (0112)

Any new large building developments must include Medical Centres. Our GP surgeries are already oversubscribed as are our schools.

Ian R N Stewart (0131)

Support the proposals in principle subject to the caveats below:

1 Stockbridge Health Centre is at capacity pre City plan developments and additional capacity is required

2 Stockbridge Health Centre makes good use of what was a tight city centre footprint and functioned reasonably well pre-covid, however on occasion there was greater demand in the waiting areas than there was capacity to satisfy need.

3 If - as it seems - covid and covid style pandemics are to be more frequent and something with which we all have to live, then any new provision should be more spacious. That would allow the Health Centre to continue to function within the need for greater distancing

4 That would suggest that any new build should take place on a more roomy and open site. Those at Crewe Rd S/ Fettes and the RVH (Places 5 and ^) would be particularly suitable.

Lynn Grattage (0362)

Agree need many more GP practices, and hope the Council is including the fact there isn't enough already even without housing developments. Not enough Chemists as well. Why was chemist rejected at Longstone? Why not chemist at the shopping centre off Chesser Avenue.

Hallam Land Management (0599), Miller Homes Ltd (0649), CALA Management Ltd (0465)

Table 12 Healthcare Infrastructure should be amended.

The proposals set out in Table 12 – Healthcare Infrastructure are not based on a reliable or robust assessment of the impacts of pupils from new homes on healthcare infrastructure. The Healthcare Infrastructure Proposals are based on the findings of the Healthcare Appraisal (September 2021).

The Healthcare Appraisal contains a number of issues and omissions that call into question the reliability of its assessment.

The Healthcare Infrastructure proposals in Table 12 are grouped within four localities. These localities bear little relationship to the four localities used in Part 3 of the Proposed LDP for the place-based policies. The boundaries of the localities have not been shown on a plan. Each locality will take in numerous medical practice catchment areas, however, it is unclear how closely these localities follow the existing medical practice catchment areas. This adds a level of unnecessary complication for applicants seeking to understand their potential planning obligations.

The use of localities shows that the Council is considering a cumulative approach to healthcare infrastructure. The scale of the localities are too large to demonstrate a relationship between the sites included within them. There is no clear relationship between allocations in the inner city to mitigation proposed at the edge of the city. A cumulative approach would therefore fail the relationship test set out in Circular 3/2012.

Infrastructure actions should instead be based on the impact within existing medical practice catchment areas. Where cumulative mitigation solutions are considered necessary, these should be based on a suitable scale (such as across adjoining catchment areas) in order to meet the tests of Circular 3/2012.

Table 12 does not state what specific healthcare infrastructure is required. No actions have been included in the Actions column. Some general references are made to new practices and expansions in the Descriptions column, however, the size of any new premises is not stated, nor an indication of the costs. It also does not set out where the mitigation will be provided, or when. Without an identified trigger for an infrastructure action, it is not possible to suitably define a planning obligation to form part of a legal agreement.

Paragraph 16 of Circular 3/2012 is clear that planning obligations need to be rooted in the development plan. Given that specific details of planning obligations for healthcare infrastructure are not included in the development plan, they must be included in statutory supplementary guidance which would form part of the development plan once adopted. It would not be appropriate for planning obligations related to healthcare infrastructure to be

set out in non-statutory guidance, which would not form part of the development plan or be subject to the same level of scrutiny.

Table 12 does not therefore provide an adequate level of detail to allow any meaningful consultation to be carried out. It is considered that details of planning obligations relating to healthcare infrastructure should have been included in the Proposed LDP for consultation, as it is unclear whether the Council will be able to bring forward supplementary guidance before Section 22 of the 1997 Act is repealed and any subsequent transitional period.

Section 10 of the Proposed Action Programme is expected to set out the healthcare infrastructure actions required to support the development strategy set out in the Proposed LDP. However, no specific actions are stated. Some general references are made to new practices and expansions in the Healthcare Infrastructure Requirements column, however, the size of any new premises is not stated, nor an indication of the costs. It also does not state where the mitigation will be provided and no timescales are provided for the delivery of any actions. It is therefore unclear how these unspecific actions relate to the delivery of the Proposed LDP development strategy.

Miller Homes Ltd (0649), Hallam Land Management (0599)

Paragraph 1.2 of the Healthcare Appraisal (September 2021) states that it is a ...high level assessment... and that further actions will be necessary to refine the assessment. These further actions include discussion with the individual medical practices.

A high level assessment is an inadequate level of assessment for a Proposed LDP. The future further actions noted in paragraph 1.2 should have been undertaken and made available for public comment during the consultation period. Discussion with the medical practices is a significant omission, as these medical practices (as independent contractors) would need to agree to any mitigation proposed at existing premises. Mitigation proposed without the agreement of these medical practices may not be deliverable. It is therefore unclear whether the necessary healthcare infrastructure can be made available to support the Council's development strategy.

Further consultation with medical practices would also allow greater consideration to be made between physical capacity constraints and workforce capacity. Audit Scotland has recently highlighted concerns regarding the recruitment and retention of GPs in Scotland. The Healthcare Appraisal needs to ensure that a clear distinction between infrastructure capacity issues and workforce capacity issues (which are not related to planning) has been made in its capacity assumptions.

Perceptions of capacity may also be complicated by the ongoing Covid-19 pandemic. It is important to ensure that current social distancing policies limiting patient numbers in medical practices do not skew physical capacity assumptions applied in this Healthcare Appraisal. This cannot be confirmed in this Healthcare Appraisal as it does not include a detailed assessment of capacity in existing medical practices.

The Healthcare Appraisal does not conduct an appropriately detailed impact assessment. Consequently, it is unable to define the mitigation required to accommodate the impact of the Proposed LDP. Some general references are made to new practices and expansions; however, the size of any new premises or extensions are not stated, nor an indication of



the costs. It also does not set out where the mitigation will be provided, or when. It therefore cannot be demonstrated that any planning obligations sought on the basis of this Healthcare Appraisal would meet the scale and kind tests in Circular 3/2012 Planning Obligations and Good Neighbour Agreements or that they relate to the impact of specific developments.

As a minimum, it would be expected that the Healthcare Appraisal methodology would begin by identifying the medical practice catchments that have housing allocations proposed within them, and then assess existing capacity. Instead, the Healthcare Appraisal has grouped sites within four localities (North West, North East, South West and South East) and has considered potential high-level impacts within these.

These localities bear little relationship to the four localities used in Part 3 of the Proposed LDP for the place-based policies. The boundaries of the localities have not been shown on a plan. Each locality will take in numerous medical practice catchment areas. However, it is unclear how closely these localities follow the existing medical practice catchment areas. This adds a level of unnecessary complication for applicants seeking to understand their potential planning obligations.

The use of localities shows that the Council is considering a cumulative approach to healthcare infrastructure. The scale of the localities are too large to demonstrate a relationship between the sites included within them. There is no clear relationship between allocations in the inner city to mitigation proposed at the edge of the city. Therefore, the use of localities may force a development to make financial contributions towards healthcare infrastructure outwith the catchment area that it is in.

A cumulative approach would therefore fail the relationship test set out in Circular 3/2012. This reflects the concerns raised by Reporter Liddle in his Report to Ministers on the Council's Supplementary Guidance on Developer Contributions, in which the Council adopted the same approach. The Council were directed not to adopt the Supplementary Guidance by Ministers. One of the reasons for Ministers' direction was that ...the Supplementary Guidance does not provide sufficient certainty that contributions sought on the basis of it will be always be used for the purpose for which they were gathered.

Infrastructure actions should instead be based on the impact within existing medical practice catchment areas. Where cumulative mitigation solutions are considered necessary, these should be based on a suitable scale (such as across adjoining catchment areas) in order to meet the tests of Circular 3/2012.

The Healthcare Appraisal does not set out the expected level of patients per household. It is therefore unclear what scale of impact is anticipated as a consequence of the Proposed LDP strategy. Paragraph 2.2 states that a proposed 5,350 units ...would generate additional population of over 10,000 people suggesting around 2 people per household. The number of people per household is likely to vary within different areas of the City, and depending on the type of housing proposed. Flats in the city centre are likely to have fewer residents than houses on edge of the city. It is noted that the Proposed LDP strategy to deliver high-density brownfield development will predominantly comprise flatted properties.

In addition, the Healthcare Appraisal does not make any allowance for existing patients migrating within the city. In reality, some persons buying new homes delivered on the proposed allocations will already live in the area. Research conducted within East Lothian

found that it is generally expected that around 33% of new homes are purchased by persons already living in the postcode area. This percentage is likely to rise when considering a larger area, such as the localities used in the Healthcare Appraisal. The Healthcare Appraisal therefore does not demonstrate that any planning obligations sought on the basis of this Healthcare Appraisal would meet the relationship and necessity tests in Circular 3/2012.

The level of proposed development also appears to be high compared against the Proposed LDP. The Healthcare Appraisal has assumed a higher number of homes can be delivered on a number of the brownfield sites compared to the Proposed Plan. The Healthcare Appraisal has assumed around 3,000 more homes will be delivered across the brownfield sites. The assessments in Sections 2-4 of the Healthcare Appraisal also assume a higher level of development on brownfield sites compared with the list of sites included in its own Appendix. These discrepancies between the assumed number of homes raises further doubts about the reliability of the Healthcare Appraisal.

The Healthcare Appraisal does not provide a robust and reliable assessment of the impact of the Proposed LDP strategy on healthcare infrastructure. The high level assessment undertaken does not provide a suitable level of detail for a Proposed LDP consultation, and is not sufficient to demonstrate that the healthcare infrastructure is capable of accommodating the Proposed LDP strategy. It also fails to establish that the undefined infrastructure actions are able to meet the relationship, necessity and scale and kind tests in Circular 3/2012.

#### Helen Forrest (0315)

Concerned that there will be insufficient GPs to man the health centres which will be required as a result of the following developments;  
CC3, H1-H28, EW2a-EW2d, H29-H34, EW1A-EW1C, H35-H58, DEL4, HSG1-HSG32, H59-H70, HSG31, H71-H85, HSG15-HSG40, H86-H95

#### Archie Clark (0003)

Table 12 - Healthcare Infrastructure – I understand there are issues with the provision of medical services in the Juniper Green/ Currie/ Balerno corridor following a substantial number of additional houses being built. There are no healthcare proposals for this area. At what stage will Healthcare provision be reviewed?

#### Genna Spears (0081)

Regarding healthcare proposals there are no provisions for South Gyle, East Craigs and Corstorphine which needs more services for the current housing stock.

#### Cramond & Barnton Community Council (0243)

In Healthcare Infrastructure Proposals, North West Locality a reference is made to '.... A new practice for West Edinburgh is already being planned ...'. It is assumed that this refers to a new GP practice at the proposed Maybury Hub, which will serve the new Cammo and Maybury communities. Given the rate of development at Cammo and Maybury, this provision will not be available for substantial numbers of new occupants. 'Infrastructure first' objectives are not being met.

New or redeveloped toilets should be included as projects or safeguards (e.g. replacement of public toilets at Cramond). Public toilets are a key public healthcare provision but are not mentioned in City Plan.

Proposals for the new Edinburgh Eye Pavilion should be included as a project or safeguard.

Stirling Developments Limited (0303)

Regarding Healthcare Infrastructure proposals the Garden District does not appear to be allocated in the plan, given this, therefore unsure why this site would be relevant to healthcare provision in the South West locality. Seek clarity on how contributions for healthcare are to be dealt with.

Juniper Green & Baberton Mains Community Council (0306)

Regarding "Healthcare Appraisal", agree with the comment in section 2.125 on page 32 that "primary care provision is already at capacity in many parts of the city at present and is struggling to meet additional new population demand". However, there are no proposals in Table 12 to show what is to happen within existing communities. These need to be addressed before new developments are built, as substantial developments have taken place over recent years which impact on local GP practices.

Table 12 - Healthcare Infrastructure: there are issues with the provision of medical services in the Juniper Green/ Currie/ Balerno corridor following a substantial number of additional houses being built. There are no proposals for this area and this needs review.

Susie Ross (0440)

Suggests that the Fettes/Crewe Road South site be used for the new Eye Pavilion being explored on the grounds that it is an area already very well-served by public transport and there are already many research facilities at the WGH and ambulances, A & E facilities etc. Its close proximity to the WGH would, surely, be of huge significance for both establishments. It would be an environmental travesty if the greenfield site was used for any new build. It is home to curlews, an endangered species, and many other rare birds, bats etc. In addition, developing this greenfield site would inevitably have a direct impact on the wildlife currently within the RVH site, Fettes College site, Inverleith Park and Comely Bank Cemetery.

Roderick Alexander (0454)

The existing health centre in Davidson's Mains is already operating at close to capacity and yet the plan has made no provision for future housing development at the brownfield site at the former Clydesdale/Clelands garage site in Davidson's Mains.

The provision requires to be reviewed in the context of the planned housing development on the site.

Melford Developments Ltd (0308)

Delete clause (c) of Inf 3 and differentiate between brownfield and greenfield sites in contribution zones.

Object on the basis that there is limited information provided in relation to contribution zones and in respect of individual areas for mitigation particularly education and healthcare.

This policy requires to be consistent with the Circular. At present the baseline for defining contributions is inadequate. Contribution zones should now differentiate between brownfield and greenfield sites given the nature of the LDP and relative viability differentials.

Further information is required in relation to cumulative assessment and reference should also be made to development costs and viability.

Contributions towards healthcare should not be progressed. Most healthcare facilities operate as private businesses and should not be supported by the development industry. Does case law support such an approach, unlikely?

#### AREAA (0358)

Delete criteria C of Policy INF 3 (P125) “primary healthcare infrastructure capacity – proposals to provide floorspace for the provision of new facilities or to extend existing facilities”

Increasingly across Scotland emerging draft development plans contain requirements for developer contributions for healthcare provision. This is always a point of contention for two reasons.

Firstly, the NHS is provided for by general taxation which housebuilders and new residents of the homes they build are contributors.

Secondly, GPs tend to operate as private businesses and it would be wholly inappropriate for one private business to pay for another through planning obligations.

For this reason, criteria C of Policy INF 3 should be deleted.

#### Crosswind Developments Ltd (0184)

CDL object to the requirements of Policy Inf 3 and request further information as to how healthcare and green network meet the criteria for developers’ contributions which is explored below.

Increasingly across Scotland emerging draft development plans contain requirements for developer contributions for healthcare provision. This is always a point of contention for two reasons.

Firstly, the NHS is provided for by general taxation which housebuilders and new residents of the homes they build are contributors.

Secondly, GPs tend to operate as private businesses and it would be wholly inappropriate for one private business to pay for another through planning obligations.

For this reason, “c” of Policy INF 4 should be deleted.

Green blue networks are not impacted upon by development, nor is the need to maintain, improve or expand blue green networks linked to development. It is not related in scale or kind from the development therefore, a contribution for this is not suitable. Therefore, the first part of point “d” should be removed.

CDL are not clear that point “e” is aligned with the findings of the Supreme Court in terms of Aberdeen City and Shire Strategic Development Planning Authority v Elsick Development Company Limited. On this basis CDL propose that point “e” is deleted.

#### NHS Lothian (0596)

Policy Inf 3 states that proposals will be required to deliver or contribute to infrastructure provision where relevant and necessary to mitigate any negative impact of a proposed development and to ensure that proposals can meet the Council's sustainable transport targets. The Policy states that this will include providing floorspace for new primary health care facilities, or to extend existing facilities. NHS Lothian would request that this requirement is amended so that it refers to the provision of healthcare facilities more generally, rather than just focusing on primary healthcare infrastructure.

#### University of Edinburgh (0464)

The approach to health and wellbeing should seek to encourage this to be a factor to be considered in the design of new facilities as well as considered from the perspective of wider health and wellbeing infrastructure – to ensure that the city is well placed to deliver what the population needs to maximise health and wellbeing benefits. This should include healthcare infrastructure, active travel networks and access to open spaces and sport and recreational facilities.

The University of Edinburgh's Biodiversity Strategy promotes the further development of “green communities”. Interactions and communities are central to the strategy, not only in terms of conservation of nonhuman organisms but also in terms of human interaction with and community in nature for health and wellbeing. Human health relies on ecological systems and species within them, but physical and psychological wellbeing has also been linked to contact with biodiversity or nature.

The University's Green Communities programme meets this need by providing staff and students with opportunities to green campuses and participate in community projects in the wider Edinburgh community. It supports the vision of their Biodiversity Strategy.

Health and wellbeing touch all aspects of University activity – the health and wellbeing of the University's staff and students is intrinsically linked to the success of the University as a whole, and a key aspect of this is the appropriate location, design, and specification of all estates facilities and associated spaces between and adjacent to buildings to support a healthy environment.

#### Roseberry Estate (0618)

The Council should provide evidence to support the need for healthcare contributions. The Council have recently lost an appeal on this issue and it is important that evidence is made available to support this, It is unclear why Fife Council (see Committee Report on 19/00250/EFULL) consider that there is no legal mechanism in the planning system to secure contributions towards healthcare, we would be keen to understand why Edinburgh feel differently.

Brian Grange (0042)

Additional healthcare facilities are required as a result of development at Crewe Road South.

**The following representations support the Healthcare Appraisal:**

Alistair Gillies (0035), Mike Richardson (0109), Julie Robertson (0210), Suzanne Baxter (0237), Antonio Alonzi (0270), Mrs Patricia Stott (0349), Tony Gray (0291), Michelle Mckinley (0432)

**Modifications sought by those submitting representations:**

**Delivery of Infrastructure**

Hallam Land Management (599), Miller Homes Limited (0649)

Modify action programme to set out actions to deliver infrastructure requirements and the proposed development strategy with information on costs, how they will be funded, who will deliver them and when they expect to be delivered. Modify action programme to include healthcare infrastructure actions, details of requirements, costs and timescales.

**Inf 3 Infrastructure Delivery and Developer Contributions**

Newcraighall LLP (0466)

Make the following modifications to Part 3: Infrastructure and Transport Policies Inf 3 Infrastructure Delivery and Developer Contributions Proposed City Plan 2030:

- Policy Inf 3 p.125 - 'Where, by the nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions will be sought.' The nature of the infrastructure should be defined, and if it cannot be delivered by the developer directly, it should be clarified how developer contributions are to be sought.
- Inf 3 p.126 – delete 'c. primary healthcare infrastructure capacity – proposals to provide floorspace for the provision of new facilities or to extend existing facilities'.

Barratt David Wilson Homes (0677), Steve Loomes (0767)

Modify plan to give evidence that developer contributions for healthcare actions are required and justified.

Homes for Scotland (0404), Wright PDL (0078)

Modify plan to give evidence that developer contributions for healthcare actions are

required and justified.

Tessa Haring (0112)

No modification proposed.

Ian R N Stewart (0131)

Modify Plan to provide new healthcare capacity associated with Stockbridge Health Centre

Lynn Grattage (0362)

No modification proposed.

Hallam Land Management (0599), Miller Homes Ltd (0649), CALA Management Ltd (0465)

Table 12 Healthcare Infrastructure and the Action Programme should be amended to list specific infrastructure requirements in the catchment areas of each existing and proposed medical practice. This should include the location, timing, size and type of infrastructure to be provided.

Miller Homes Ltd (0649), Hallam Land Management (599)

A Healthcare Appraisal need prepared that sets out an appropriately detailed impact assessment of new development.

Helen Forrest (0315)

No modification proposed.

Archie Clark (0003)

No modification proposed.

Genna Spears (0081)

No modification proposed, but implies healthcare provisions for South Gayle, East Craigs and Corstorphine.

Cramond & Barnton Community Council (0243)

Implies modification to bring forward new healthcare facility more promptly for West Edinburgh. Modify plan to include public toilet provision as part of healthcare requirements. Include proposals for the new Edinburgh Eye Pavilion.

Stirling Developments Limited (0303)

Modify plan to delete reference to healthcare associated with the garden district.

Juniper Green & Baberton Mains Community Council (0306)

Modify Table 12 to include existing healthcare provision issues.  
Modify Table 12 to include provision of medical services in the Juniper Green/ Currie/ Balerno corridor.

Susie Ross (0440)

Modify plan to identify the Fettes/Crewe Road South site for the new Eye Pavilion.

Roderick Alexander (0454)

Modify the plan to identify new healthcare provision to supplement the existing health centre in Davidson's Mains.

Melford Developments Ltd (0308), AREAA (0358)

Modify Policy to delete clause (c) of Inf 3.

Crosswind Developments Ltd (0184)

Modify Policy to delete criterion c, to delete first part of criterion d and delete criterion e.  
Amend policy as follows;

"Proposals will be required to deliver or contribute to the following infrastructure provision where relevant and necessary to mitigate\* any significant negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Council's sustainable transport targets (mode share targets) and where commensurate to the scale of the proposed development:

a. transport proposals and safeguards from Part 4, tables 3-10 and/ or interventions identified in transport assessments and/or transport consultations in accordance with Policy Inf 4 Provision of Transport Infrastructure,

b. education provision including new schools, early years nursery proposals, school extensions to accommodate additional classrooms, and associated requirements to support the additional pupil numbers such as dining and gym facilities, taking into account opportunities to co-locate community services from Part 4, table 11, c. public realm where identified for the town centres or projects delivering the Council's City Centre Transformation. "

NHS Lothian (0596)

Modify the policy so it refers to the provision of healthcare facilities more generally.

University of Edinburgh (0464)

Modify the Plan to include health and well being in the design of new facilities as well as considered from the perspective of wider health and wellbeing infrastructure.

Rosebery Estate (0618)

Modify Plan to provide evidence to support the need for healthcare contributions.

Brian Grange (0042)



Modify Plan to provide additional healthcare facilities as a result of development at Crewe Road South.

### **Summary of responses (including reasons) by planning authority:**

#### **Delivery of Infrastructure**

Hallam Land Management (0599), Miller Homes Limited (0649)

The Council considers there is a clear link between the actions in the Action Programme and the Proposed Plan. Each of the actions in the action programme have a reference and most of them also have a Plan reference as well. The Plan reference relates to the Part 4 Proposals section of the Plan and this section sets out a series of tables with proposals for the various types of infrastructure. Where actions relate to a specific development proposal this is usually identified in the table. With regard to Education actions, a full break down of sites, their impacts and where actions are required to address these impacts can be found in the Council's Education Appraisal (CD015).

The content of action programmes is set out by legislation in section 21 of Part 2 of the Planning Scotland 2006 act (CD147) and the T&CP (Development Planning) (Scotland) Regulations 2008 (CD148)– Part 5 s.26 Form and Content of action programmes, which states: 'An action programme is to set out the following matters–

- (a) a list of actions required to deliver each of the policies and proposals contained in the relevant plan;
- (b) the name of the person who is to carry out each such action; and
- (c) the timescale for the conclusion of each such action.'

As such, costs are not required to be included. The Council considers the Action Programme has met the requirements of the legislation and regulations.

The Action Programme's role is to set out actions to deliver the plan's policy and proposals, not to set out how proposals themselves are delivered. It does not set out the delivery mechanism and funding of developers or Registered Social Landlords.

At this point in the plan's preparation, and this first Proposed Action Programme, it is not possible to be more specific around timescales of delivery. Most actions will be delivered with development, and so will follow the delivery and phasing timescales of development. Subsequent action programmes will be in a position to provide more information on delivery timescales, as development proposals come forward and are continuously informed by the pace of housing completions as evidenced by the Council's annual housing land audit and completions programme.

The Council considers the actions and the Plan's strategy can be delivered within the timeline of the Plan.

The Council when preparing the Plan engaged with the Edinburgh Health and Social Care Partnership. The Partnership have a responsibility, on behalf of NHS Lothian, to identify the impacts of future population growth on medical practices, and to plan for actions to mitigate those impacts. Additional housing development is a key source of growth in Edinburgh's population and in turn patient lists. The Council requested from the

Partnership an up to date primary healthcare appraisal in order to identify the impacts of new housing development on existing medical practices, and identify actions in order to mitigate those impacts to accompany the Proposed Plan. Unfortunately as a result of the Covid 19 pandemic the Partnership were unable to provide an up to date assessment before the Plan's publication. As a result, the Council had to rely on a preliminary draft that had been prepared at an initial stage in the Plan's preparation. The Council acknowledges that the information contained within the Plan is less than ideal but in the unprecedented circumstances seemed prudent to include.

The Partnership have now prepared an up to date appraisal (CD017). The appraisal sets out the current position of medical practices which established a baseline based on existing committed developments using data from the 2021 Housing Land Audit (CD055) which was the most up to date approved audit. Then the appraisal identifies the anticipated population generated by the additional housing sites proposed in the Plan and sets out a series of actions in the form of new practices or practice extensions to address the impacts of this additional population. What the appraisal demonstrates firstly is that existing medical practices have very little spare capacity to accommodate existing committed developments and that various actions are being planned to address that the new population. Secondly, it demonstrates that the new development sites in the Plan will significantly increase the population in Edinburgh and that the existing medical practices are unable to absorb that additional population. Thirdly, it identifies a series of new infrastructure actions that are required to accommodate the additional population generated by the new development sites in the Plan. As a result, the evidence in the health care appraisal demonstrates that the Council is justified for including a requirement within Policy Inf3 that developers provide or make contributions towards new primary healthcare infrastructure capacity. The Council considers the findings of the appraisal will inform the next update of the Action Programme. The Council has no objection to the reporters including the actions within a revised Table 12 of the Proposed Plan if they are minded to do so.

As set out in para 3.197 of the Plan planning guidance will be prepared that sets out the mechanism for the detailed calculation of proportionate contributions within a contribution zone. Any developer contributions sought will be done in accord with the requirements of Circular 3/2012 (CD117). **No modification proposed.**

### **Inf 3 Infrastructure Delivery and Developer Contributions**

#### Newcraighall LLP (0466)

The Council considers that seeking the provision of or contributions towards healthcare infrastructure is justified for the reasons set out in its response to 0559 and 0649 above.

The Council considers the nature of infrastructure is defined in the plan, in particular in Part 4 and in the Action Programme. The Council does not consider the wording of Inf 3 is unclear and any perceived ambiguity is resolved by further explanation in the supporting text paragraphs 3.197 to 3.199.

The Council considers that the principle of development providing or contributing towards the provision of additional healthcare infrastructure to address the population generated is an issue that can be addressed by the planning system. This is a principle that is already embraced within existing planning policy. Policy Hou10 of the adopted LDP states that planning permission will only be granted where there are associated proposals to provide

any necessary health facilities relative to the impact and scale of the development proposed. This policy and principle was not amended to remove healthcare infrastructure in the LDP's examination and therefore it is established in the Council's planning policy history as a valid form of infrastructure requirement required to support housing growth/mitigate the impacts of housing growth. Furthermore, the Council has been receiving developer contributions towards the provision of additional healthcare infrastructure for many years. All existing and future developer contributions sought will be done in accord with the requirements of Circular 3/2012 (CD117). **No modification proposed.**

Barratt David Wilson Homes (0677), Steve Loomes (0767)

An up to date healthcare appraisal has been prepared as referred to in the Council response to 0599 above. **No modification proposed.**

Homes for Scotland (0404), Wright PDL (0078), Steven Loomes (0767)

The Council acknowledges that the refusal of planning permission for application 16/04738/PPP (DPEA Ref: PPA-230-2207) (CD142) was overturned at appeal. The Council considers it important to stress that the appeal related to an allocated site within the adopted LDP which was refused consent on a number of grounds none of which were related to healthcare provision. The appeal was granted for a number of reasons including impact on the greenbelt, design, effective master planning, and transport. It is misleading to suggest that the Council lost the appeal on healthcare contributions. Healthcare contributions were considered at the appeal with respect to agreeing planning obligations. Furthermore, the reporters were satisfied, as set out in paragraph 114 of their decision, that the proposal would create a direct need for healthcare facilities. Although the reporters considered there was a lack of evidence to establish if the contribution was fair and reasonable this was largely because a healthcare appraisal was not provided as evidence during the appeal to justify the level of contributions sought. Matters relating to contribution zones, and the levels of contributions are relevant in the context of the preparation of the planning guidance, referred to in para 3.97 of the plan, not in terms of the content of the Plan. The purpose of the Plan is to establish the principle for developer contributions being sought for healthcare infrastructure, and the Council has set out its position with regard to that in its response to 0466 above.

The Council considers matters have progressed considerably since the Scottish Ministers issued a direction to the Council on 17 January 2020 not to adopt its finalised Developer Contributions and Infrastructure Delivery Supplementary Guidance (CD045). The Council emphasises that the Scottish Ministers' decision with regard to healthcare was on the grounds that the adopted LDP did not specifically refer to healthcare in Policy Del 1 in the context of preparing statutory supplementary guidance. Such a situation is unlikely to be repeated in the future, as the Council has included healthcare within Inf3 accordingly.

The Council considers seeking developer contributions towards healthcare infrastructure is justified for the reasons set out in its response to 0466 above. The updated Healthcare appraisal (CD017) provides the clear link between the impacts of development and the required actions to mitigate that impact. **No modification proposed.**

With regard to Education the Council response to this matter is set out in its response under Issue 29: Infrastructure Delivery – Education.

Tessa Haring (0112)

The Council agrees that new developments should make a contribution toward healthcare infrastructure in accord with the provisions of Circular 3/2012 (CD117).

Ian R N Stewart (0131)

As referred to in the Council's response to 0599 above the Edinburgh Health and Social Care Partnership have prepared a detailed appraisal to identify the impacts of new housing development on existing medical practices, and identify actions in order to mitigate those impacts. The actions identified in the appraisal will be set out in the revised action programme. **No modification proposed.**

Lynn Grattage (0362)

The Council notes the comments submitted. Matters related to provision of chemists is not a relevant matter for the development plan. **No modification proposed.**

Hallam Land Management (0599), Miller Homes Ltd (0649), CALA Management Ltd (0465)

As referred to in the Council's response to 0599 above the Edinburgh Health and Social Care Partnership have prepared an up to date detailed health care appraisal (CD017) to identify the impacts of new housing development on existing medical practices, and identify actions in order to mitigate those impacts. The actions identified in the appraisal will be set out in the revised action programme.

The Edinburgh Health and Social Care Partnership monitors and analyses population change across Edinburgh in the form of four localities. There is no requirement for those localities to be included in the plan nor is there any relationship between it and the areas identified in Part 3 of the Plan with regard to the place based policies. The Council has no intention of using the Partnership's locality boundaries for establishing developer contribution zones. Details relating to size and number of contribution zones, identification of development allocations within zones, levels of contribution etc and the justification for them are matters that will be addressed in the updated planning guidance as referred to in para 3.197 of the Plan. The Council agrees that developer contributions and the guidance should meet the requirements of Circular 3/2012 (CD117). The Council does not consider there is any requirement for planning obligations to be included within statutory supplementary guidance and has stated in para 3.197 that the provisions will be set out in a "planning guidance", i.e. non-statutory. As a result, the repeal of Section 22 of the 1997 Act (CD101) is not relevant. The Council will consult on the planning guidance as part of the process of preparing it, which will allow its contents to be given an adequate level of scrutiny. The final guidance will then have the status of a material consideration in the context of planning applications rather than forming part of the development plan. **No modification proposed.**

Miller Homes Ltd (0649), Hallam Land Management (0599)

The Council's position with regard to the Healthcare Assessment is set out in its response to 0599 above. The analysis and actions set out in the updated appraisal (CD017) have already been discussed with the medical practices. The appraisal focuses on infrastructure capacity issues rather than workforce capacity. Comments related to the use of locality

boundaries, and details associated with contribution zones etc has been addressed in the Council's response to Hallam Land Management (0599), Miller Homes Ltd (0649), CALA Management Ltd (0465) above. **No modification proposed.**

The updated healthcare appraisal set out the number of patients per household based on a figure of 2.1 This is considered a reasonable figure for healthcare planning purposes as it matches the average household size for Edinburgh. Whilst some households may be smaller others may be bigger and the Partnership consider it is not practical to vary the figure for different parts of the city. With regard to the reference to research for East Lothian showing that 33% of new homes are purchased by persons living in the postcode area, the Council has two concerns. Firstly, the data for East Lothian is not necessarily directly applicable for Edinburgh as East Lothian covers a large rural area, with a series of small towns. Secondly, this evidence does not demonstrate that the population is not growing and in turn not having an impact on medical practices. Whilst a new house could be purchased by someone local, their old house could in turn be purchased by someone migrating into the area, i.e. it still represents a net gain in population. The NRS population estimates and projections clearly demonstrate that the population of Edinburgh is rising. That being the case, new housing development is directly associated with inward migration and a rise in population levels with inevitable consequences for healthcare provision, which the Council is seeking to address through Policy Inf3. **No modification proposed.**

Helen Forrest (0315)

GP recruitment is a matter for NHS Lothian. **No modification proposed.**

Archie Clark (0003)

An up to date Healthcare appraisal (CD017) has been prepared by the Edinburgh Health and Social Care Partnership as referred to in the Council's response to 0599 above. **No modification proposed.**

Genna Spears (0081)

An up to date Healthcare appraisal (CD017) has been prepared by the Edinburgh Health and Social Care Partnership as referred to in the Council's response to 0599 above. **No modification proposed.**

Cramond & Barnton Community Council (0243)

The timely delivery of a new medical practice for West Edinburgh to serve committed developments is a matter for NHS Lothian.

The Council considers the provision of public toilets is an important issue, however, the Council considers this is a matter for the development management process and not a matter for the Proposed Plan. **No modification proposed.**

Stirling Developments Limited (0303)

The East of Millburn Tower (Garden District) site was not identified on the proposals map as it had not been granted consent by Scottish Ministers at the time the plan was published. However, it was factored into the housing calculations. The consent of the site for housing

development will have significant implications for the provision of healthcare and therefore it has been included within the healthcare assessment. Any developer contributions towards healthcare from the consent of this development will be progressed in accord with the requirements of Circular 3/2012 (CD117). **No modification proposed**

Juniper Green & Baberton Mains Community Council (0306)

An up to date Healthcare appraisal (CD017) has been prepared by the Edinburgh Health and Social Care Partnership as referred to in the Council's response to 0599 above. **No modification proposed.**

Susie Ross (0440)

The Healthcare Appraisal (CD017) does not identify the requirement or land to be safeguarded for a new Edinburgh Eye Pavilion. The Council understands that NHS Lothian are looking to re-provision the Eye Pavillion in some form, however, it is not clear at this stage whether a new a location is required. **No modification proposed.**

Roderick Alexander (0454)

An up to date Healthcare appraisal (CD017) has been prepared by the Edinburgh Health and Social Care Partnership as referred to in the Council's response to 0599 above. **No modification proposed.**

Melford Developments Ltd (0308), AREAA (0358)

The Council considers that seeking the provision of or contributions towards healthcare infrastructure is justified for the reasons set out in its response to 0559 and 0649 above. The boundaries and location of contribution zones is a matter for the planning guidance. **No modification proposed.**

Crosswind Developments Ltd (0184)

The Council considers that seeking the provision of or contributions towards healthcare infrastructure is justified for the reasons set out in its response to 0559 and 0649 above.

Green Blue Infrastructure and proposals are often required as part of new development (e.g. as part of Env 3 and Env 6 and table 1 showing Blue Green Network Proposals). Therefore, the Council considers it correct for Inf 3 to make provision for the delivery of this form of infrastructure, as well as for contributions toward its delivery off-site where necessary to address deficiency in new on-site provision and/or off-set an impact from development on the open space and the green blue network.

The council considers that criterion e is justified and sets out its position in detail in its responses in Issue 30: Transport Infrastructure contributions. **No modification proposed.**

NHS Lothian (0596)

Although new housing development will impact on the wider provision of healthcare facilities in Edinburgh these are regional facilities to meet the broader needs of the

population. The Council considers seeking contributions towards primary healthcare is justified in the context of Circular 3/2012 (CD117) as a direct relationship can be demonstrated between the new population generated by a development and the requirement to provide additional GP practice services to meet the needs of that additional population. The Council does not consider the same direct relationship can be demonstrated for wider healthcare or specialist services which may or may not be required by the additional population generated. **No modification proposed.**

University of Edinburgh (0464)

The Council considers the need for the design of facilities to contribute towards health and wellbeing is implicit within the strategy of the plan and that the policies of the plan will help to deliver that without the requirement for specific references, for example, policy Inf1 supports development where community facilities are within a 20minute return trip walking distance, which has health benefits in terms of encouraging active travel. **No modification proposed.**

Rosebery Estate (0618)

An up to date healthcare appraisal (CD017) has been prepared as set out in detail in the Council's response to 599 and 649 above. The Council acknowledges that the refusal of planning permission for application 16/04738/PPP was overturned at appeal. The Council considers it important to stress that the appeal related to an allocated site within the adopted LDP which was refused consent on a number of grounds none of which were related to healthcare provision. This matter is set out in detail in the Council's response to 0404, 0078 and 0767 above.

Brian Grange (0042)

An up to date Healthcare appraisal (CD017) has been prepared by the Edinburgh Health and Social Care Partnership as referred to in the Council's response to 0599 above. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 28	Infrastructure Delivery – Community Facilities	
Development plan reference:	Policy Inf 1 Access to Community Facilities Policy Inf 2 Loss of Community Facilities	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Ambassador Group (0683) Andrew Gray (0388) Archie Clark (0003) Barratt David Wilson Homes (0677) Cala Management Limited (0465) Cockburn Association (777) Crosswind Developments Ltd (0184) Cynthia Shuken (0632) E&amp;A Partnerships Ltd &amp; Niddrie Development Company Ltd (0753) Edinburgh Chamber of Commerce (0379) Hallam Land Management (0599) Hallam Land Management (0615) Homes for Scotland (0404)</div><div>Juniper Green and Baberton Mains Community Council (0306) Miller Homes Limited (0649) NHS Lothian (0596) Ratho and District Community Council (0289) Kyle Worgan (0272) Steve Loomes (0767) Scottish Property Federation (0144) Shortbread House of Edinburgh Ltd (0619) Tarmac (0244) The Davidson Mains and Silverknowes Association (0454) Wright PDL (0078)</div></div></div>		
Provision of the development plan to which the issue relates:	These policies support housing development where community facilities are within a 20 minute return trip, and seek to prevent development involving a loss of a valuable community facility.	
Planning authority’s summary of the representation(s):		
<div><div>Inf 1 Access to Community Facilities</div><div><div><div><div><u>Archie Clark (0003), Juniper Green and Baberton Mains Community Council (0306)</u></div><div>Given the Plan’s ambition to shift car trips to more sustainable modes strongly believe that more public toilets must be provided/re-opened across the city.</div><div>Consider that in the move towards 20-minute neighbourhoods would expect schools and libraries, even pubs, to take on larger roles as community centres.</div><div><u>Cala Management Limited (0465), Hallam Land Management (0599), Miller Homes Limited (0649)</u></div><div>The requirement for 20 minute neighbourhoods is not set out in any approved national planning policy or guidance. The only approved guidance on walking distances is set out in PAN 75 Planning for Transport. The inclusion of a requirement for 20 minute neighbourhoods based on the draft NPF4 should not be afforded any weight in the preparation of the Proposed LDP, as it has not been approved by Ministers and does not form part of the development plan.</div></div></div></div></div>		



While the Choices for City Plan 2030 document included a focus on sustainable communities and walking, it did not consult on the option to introduce a requirement for development to provide community facilities within a 20 minute return trip. This very specific requirement, which will have a fundamental impact on development, has not been consulted on at a formative stage in the development plan process. Instead, it has been introduced prematurely by the Council at the Proposed LDP stage on the basis of the draft NPF4, which currently does not form part of the development plan.

Circular 6/2013 identifies that the legal framework is not intended to allow the Proposed LDP to ...test the water... as ...new or controversial elements of plan content should already have been aired at the Main Issues Report stage (paragraph 80). The Council should undertake further consultation on this requirement or abandon the development of the Proposed LDP until NPF4 is approved by Scottish Ministers.

#### Hallam Land Management (0615), Tarmac (0244)

Modify Policy Inf 1 Access to Community Facilities.

Whilst the principle and sustainability of a 20-minute neighbourhood is supported it is essential that it is applied with a degree of flexibility. Whilst a walking distance of 800m is specified this is rather meaningless without an average speed. The word 'approximate' should be added to this policy in order to avoid meaningless disputes over isochrones.

Not all housing proposals will be capable of meeting this particular requirement. The policy also refers to the 'management' of services. Whilst the developer / landowner will be able to facilitate delivery ongoing management will almost certainly be in different hands.

Para 3.195 suggests some facilities 'which are necessary to foster community life'. It is questionable whether a 'water fountain' and 'public toilets' are necessary features to foster a strong community life, this should be amended in favour of real benefits accruing from development.

Finally, the provision of healthcare facilities, doctors and dentists is not something a housing developer can ensure without partnership with the NHS. Such facilities usually operate as private commercial businesses and can choose where to locate and can choose to cease to operate if they wish. What happens if a housing proposal is not within 800m walk of a local service and an alternative is not available at the time of decision making?

#### Shortbread House of Edinburgh Ltd (0619)

The policy does not properly take into consideration access to existing jobs and workplaces. These are essential as part of the 20 minute neighbourhood and existing businesses should not be pushed out of the city. This relocation would make it impossible for most of our existing team members to access to their '20-minute neighbourhood', a strong and admirable goal of the Plan. The 20-minute neighbourhood ideal should be a goal attainable for all workers, not just those in office-based roles. We must ensure Leith continues to offer a variety of employment opportunities to those with skills and trades in the industrial sector.

Barratt David Wilson Homes (0677), Wright PDL (0078), Steve Loomes (0767)

Various amendments are required to facilitate achieving the aims as set out.

Support the delivery of high-quality communities, and the promotion of active travel opportunities. However, it is unclear why these 20-minute neighbourhoods are limited to accessibility on foot, rather than also by cycling or public transport.

20-minute neighbourhoods are unlikely to be universally workable and will be dependent upon the existing urban form and surrounding area. Greenfield sites are often better able to deliver these 20-minute neighbourhoods, as necessary social infrastructure can be better delivered in a more planned way, and these sites are not constrained by the existing urban fabric.

Support the concept of walkable neighbourhoods. However, it should be understood that 20-minute neighbourhoods are unlikely to be workable in practice in every place (e.g. rural areas, existing urban areas which require the removal of listed buildings to comply, etc.). This Policy requires to be amended to enable greater flexibility in the decision-making process. The 20-minute neighbourhood concept should not be deployed as an anti-development policy.

There are several areas within the city where no new land allocations have been made, thereby limiting the opportunities to provide the necessary and desired enhancements. The City Plan Proposed Plan does not appear to seek to enable the delivery of 20-minute neighbourhoods in these areas e.g., existing suburban areas on the edge of the city.

Ambassador Group (0683)

We support the concept of the concept of '20-minute neighbourhoods' which are a key feature in the emerging NPF4. Notwithstanding this, walkable neighbourhoods which require key community facilities within a walking trip of 800 metres, are unlikely to be workable in practice in every location. This Policy requires to be amended to retain flexibility to allow appropriate developments to occur on sites depending on site specific circumstances.

E&A Partnerships Ltd & Niddrie Development Company Ltd (0753)

A broader definition of '20-minute neighbourhood' should be used.

In alignment with the approved Edinburgh Mobility Plan (2021), the Proposed City Plan 2030 places significant emphasis on the importance of 20-minute neighbourhoods in terms of creating sustainable residential developments and achieving good placemaking principles.

Our client is supportive of this approach in general, and their site at The Wisp would accord with these principles.

Notwithstanding this however, we consider City of Edinburgh Council's interpretation of 20-minute neighbourhoods is unduly restrictive and if applied across all proposed development sites, will serve to stifle the development of otherwise highly sustainable

sites. CEC's proposed definition of a 20-minute neighbourhood is as follows:

"20-minute neighbourhoods are places where people can access services which meet daily needs within a 10-minute walk/ wheel of their house, equivalent to a 20-minute round trip".

The emphasis on new development being located within a 20-minute round trip of amenities is a highly ambitious interpretation of the 20-minute principle, which in general is acknowledged as being a 20-minute single way trip – indeed, this is the RTPI's own interpretation (as per RTPI Scotland Briefing Note on 20-Minute Neighbourhoods, published 24 March 2021).

We therefore consider that Proposed Policy Inf 1 (Access to Community Facilities) should be amended to be supportive of the 20-minute neighbourhood principle as per the RTPI's definition as a minimum, while still indicating that development should strive to meet the more ambitious criteria which is currently supported in Proposed City Plan 2030.

Steve Loomes (0767)

Paragraph 2.39 notes that the Plan aims to ensure that everyone has access to a range of amenities in their area through the promotion of 20-minute neighbourhoods. This ignores existing neighbourhoods that do not have the range of amenities required. New housing allocations adjacent to existing neighbourhoods can play a role in improving the provision of services to everyone.

Inf 1 (Access to Community Facilities) - HFS supports the concept of walkable neighbourhoods. However, it should be understood that 20-minute neighbourhoods are unlikely to be workable in practice in every place (e.g. rural areas, existing urban areas which, for example, could require the removal of listed buildings to comply, etc.). This Policy requires to be amended to enable greater flexibility in the decision-making process. The 20-minute neighbourhood concept should not be deployed as an anti-development policy.

Cockburn Association (777)

Support, subject to:

The facilities and infrastructure referred to in para 3.203 needs to be considered in separate guidance and open to public consultation.

NHS Lothian (0596)

NHS Lothian are keen to work ever-closer with all of their partners, including with Local Authorities, third sector organisations, the Scottish Government, educational institutions and the private sector, in order to maximise and augment the positive impact each sector can have on citizen's lives. The Covid-19 pandemic has also shown NHS Lothian the importance of working effectively, and at speed, with all of their partners in the rest of the public sector, the third sector, and the private sector.

As NHS Lothian move from buildings that are no longer fit for purpose, they aim to utilise their land holdings to create modern, flexible and multi-use, accommodation to replace them. When NHS Lothian are required to replace or build new facilities, they are

committed to working with their partners from across the public square to ensure that these are multi-use and bring together as many services as possible. NHS Lothian are therefore supportive of the reference within Policy Inf 1 that states that “where possible, delivery of new community facilities should be as part of multi service hubs that bring community services together”.

However, NHS Lothian would stress the importance of a partnership approach to the provision of flexible, community facilities such as those promoted by Policy Inf 1 and would therefore encourage the CEC to include reference to this within the scope of the Policy. NHS Lothian would also welcome a reference within the Policy that states that the provision of community services is something that must be discussed as an integral part of development proposals, and that relevant bodies should be brought together to discuss community facility provision at the outset of projects. NHS Lothian also consider that services or facilities cannot be created without seeking the views of the communities they will ultimately serve, so would also support the addition of text within the Policy that sets out a need for developers to consult with and engage in dialogue with communities.

NHS Lothian understand that “community facilities” can relate to a multitude of uses and amenities, as highlighted by the supporting text for the Policy. NHS Lothian would therefore ask the CEC to consider the creation of a separate policy that supports development by NHS Lothian, and the wider Lothian Health and Care System, within the city. By way of an example, Midlothian Council have the following policies within their adopted Local Development Plan, which provide support for development that is related to health care and emergency services provision:-

- Policy IMP 4 Health Centres states that “the Council supports the development of new or extended health centre facilities where there is an identified need to enhance health services within a community”.
- Policy IMP 5 Emergency Services states that “the Council supports the provision and/ or expansion of facilities to enable the emergency services in Midlothian to cater for its existing and expanded communities, and for the proposed new developments”.

NHS Lothian would note that there are significant opportunities in the city for sharing energy, sustainable energy and transport infrastructure, which should be referenced within the concept of creating 20 minute neighbourhoods.

#### The Davidson Mains and Silverknowes Association (0454)

The DMSA fully supports the concept of 20 Minute Neighbourhoods and welcomes that the Plan is clear in the intention to embed the detail in new developments. However, the plan is very weak on how progress will be made in mature communities such as Davidson's Mains. It is one of many local centres across the city where local shopping and other local services have deteriorated over the past decades. Policies to reinvigorate local centres are essential if other targets around increasing active travel and reducing car use are to be achieved.

It would be beneficial to develop the plan to provide more information on how the 20 Minute Policy will be developed in mature communities where the potential exists for existing village centres to be improved to meet all the necessary requirement of a

community, social and commercial centre for a designated 20 Minute Neighbourhood.

Scottish Property Federation (0144)

We are also concerned that the requirement for new development to be located within the definition of a 20 minute neighbourhood is unnecessarily restrictive. If taken to its fullest definition, this would mean that a person should be able to leave their residence and within a 20 minute walk reach all of their social, health and economic requirements. This may not always be feasible in the context of city centre sites and again, the approach could conflict with potential regeneration of, for example former city centre offices or large industrial premises. If the requirement for development is rigidly required within the city's planning policies to meeting all of the tenets of a 20 minute neighbourhood, then we fear that the consequence could be that investment is attracted to alternative locations and regeneration projects could simply not happen.

The plan makes the achievement of 20 minute neighbourhoods a key outcome, defined as amenities being within a 800m walk. Again, the SPF recognises and supports the aspiration of 20 minute neighbourhoods but the plan should not be overly prescriptive across the whole of the city. There will be locations where some forms of development - alternative leisure uses for example, will support the regeneration of core high street locations. But it may not be possible for all developments to achieve all of the tenets of affordable housing demands, mixed-use developments and 20 minute neighbourhoods. The city must ensure that its planning policies do not constrain developments that can complement other uses.

We would also like to see the plan better acknowledge that the 20 minute neighbourhood concept needs to be flexible, as not every site will be able to cater for all amenities within a 20 minute walk. Taken to its extreme the policy could inhibit potential town centre renewal. Similarly the mixed use development aspirations need to be cognisant of how commercial developments may complement other uses within a location, and therefore should not always be required to meet high barriers of housing supply requirements stipulated by the plan.

Homes for Scotland (0404)

Aim 1 of the Plan supports the delivery of high-quality communities, and the promotion of active travel opportunities. It is unclear why these 20-minute neighbourhoods are limited to accessibility on foot, rather than also by cycling or public transport.

20-minute neighbourhoods are unlikely to be universally workable and will be dependent upon the existing urban form and surrounding area. Greenfield sites are often better able to deliver these 20-minute neighbourhoods, as necessary social infrastructure can be better delivered in a more planned way, and these sites are not constrained by the existing urban fabric.

There are several areas within the city where no new land allocations have been made, thereby limiting the opportunities to provide the necessary and desired enhancements. The City Plan Proposed Plan does not appear to seek to enable the delivery of 20-minute neighbourhoods in these areas e.g., existing suburban areas on the edge of the city.

Kyle Worgan (0272)

Alter paragraph 3.195 to refer to health and wellbeing.

Andrew Gray (0388)

"Aim 1. Delivering a network of 20-minute walkable neighbourhoods and embedding a 'place-based' approach to the creation of high quality, high density, mixed-use and walkable communities, linked by better active travel and public transport infrastructure, green and blue networks and bringing community services closer to homes." What exactly does that mean in English? What is a "walkable neighbourhood"? What is a "place-based approach"? What is "better active travel"?

If you explain your ambitions in terms that people can understand (and I have a degree in English and don't understand), then they will be able to comment in an informed way. Jargon helps no one, however laudable your aims may be.

Edinburgh Chamber of Commerce (0379)

20 minute neighbourhoods are being pursued at expense of the city centre. Ignores contribution city centre makes and 20 minute neighbourhoods should make reference to the future of the city centre.

Crosswind Developments Ltd (0184)

CDL seek an amendment to this policy (page 125) to bring it in line with the requirements set out in the draft NPF4. Page 73 of the draft NPF4 relates to 20 minute neighbourhoods and states:

"20 Minute Neighbourhoods are a method of achieving connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle (within approx. 800m ) of their home".

It is noted that 800m is a 10 minute walking distance and appropriate distances for wheeling and cycling should also be expressed.

CDL seek to emphasise that a liveable city should be accessible by wheeling, cycling and walking. To reflect this and to ensure City Plan is compliant with the draft NPF4.

Cynthia Shuken (0632)

I would like to see allotments specifically included in the list of amenities that should be provided within walking distance of developments. This would fit in with the Council's published aims of supporting the health of residents, encouraging local and sustainable food production and supporting the environment (by reducing food miles and other types of pollution, since most allotment growers produce food organically, recycling waste, etc).

Supportive Responses

Michael Ramsay (0011)

**Inf2 Loss of Community Facilities**

Ratho and District Community Council (0289)

Inf 2 - Development should include extension involving the loss of a valuable community facility. Appropriate alternative facility needs to take into account the community views not just the developer.

Inf 2 - Development should include extension involving the loss of a valuable community facility. Appropriate alternative provision needs to be reinforced especially to Council Departments - for example the extension of a school into a Community Centre with a proposed replacement single small area with sliding partitions to replace a full size recreational hall, 3 further rooms, and kitchen is not acceptable to the community and definitely .

Homes for Scotland (0404)

The Council should provide more clarity on how a “valuable community facility” is to be identified. It should avoid an approach which encourages reactive designations that are primarily designed to thwart development.

Cala Management Limited (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The inclusion of a requirement for 20 minute neighbourhoods in this policy based on draft NPF4 is premature. The introduction of this requirement at this stage in the development plan process is also not appropriate, as it was not consulted upon at a formative stage i.e. Choices for City Plan 2030. The only approved guidance is set out in PAN 75 Planning for Transport.

All references to the requirement for 20 minute neighbourhoods should therefore be removed from the Proposed LDP.

Barratt David Wilson Homes (0677), Steve Loomes (0767), Wright PDL (078)

The Council should provide more clarity on how a “valuable community facility” is to be identified. It should avoid an approach which encourages reactive designations that are primarily designed to thwart development.

Cynthia Shuken (0632)

I would like to see preservation (and increase) of allotment sites directly listed in this section as important facilities.

**Supporting Responses**

Ronald Shaw (0084), support Policies Inf1-5

**Modifications sought by those submitting representations:**

**Inf 1 Access to Community Facilities**

Archie Clak (0003), Juniper Green and Baberton Mains Community Council (0306)

No modification specified but representation infers that public toilet provision should be part of the plan and there should be a wider role for schools, libraries and pubs.

Cala Management Limited (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Council should undertake further consultation on this (20 minute neighbourhood) requirement or abandon the development of the Proposed LDP until NPF4 is approved by Scottish Ministers.

Hallam Land Management (0615), Tarmac (0244)

Modify Policy Inf 1 Access to Community Facilities

- Add 'an approximate' before '20 minute' in first sentence.
- 'and managed as an integral component of a mixed-use development' should be deleted.
- Alter para 3.195 to simply say 'Facilities such as schools/lifelong learning, green spaces, sport and recreation, local doctor and dental surgeries, local shops and community facilities assist in fostering community life and reducing the need to travel for everyday services. Such uses should be available within walking distance of proposed housing development.'

Shortbread House of Edinburgh Ltd (0619)

Modify policy to take into account existing jobs and workplaces.

Barratt David Wilson Homes (0677), Wright PDL (0078), Robertson Residential Group (Steve Loomes) (0767)

Modify policy to allow greater flexibility.

Ambassador Group (0683)

Modify policy to allow greater flexibility.

E&A Partnerships Ltd & Niddrie Development Company Ltd (0753)

Modify policy to be supportive of the 20-minute neighbourhood principle as per the RTPI's definition as a minimum, while still indicating that development should strive to meet the more ambitious criteria which is currently supported in Proposed City Plan 2030.

Cockburn Association (777)

No modification proposed but infer adding reference to separate guidance.

Edinburgh Chamber of Commerce (0379)

Change reference in aims to include city centre.

NHS Lothian (0596)



Modify policy to refer to the importance of a partnership approach to the provision of flexible, community facilities, a reference that states that the provision of community services is something that must be discussed as an integral part of development proposals, and that relevant bodies should be brought together to discuss community facility provision at the outset of projects. In addition, the need for developers to consult with and engage in dialogue with communities.

Modify policy to include reference to sharing energy, sustainable energy and transport infrastructure in the context of 20 minute neighbourhoods.

Modify plan to add policy that supports development by NHS Lothian.

The Davidson's Mains and Silverknowes Association (0454)

Modify plan to provide more information on how the 20 minute neighbourhood policy will be developed in mature communities for existing village centres to be improved.

Scottish Property Federation (0144)

Modify policy to be more flexible.

Homes for Scotland (0404)

No modification identified but implies policy Inf1 should be altered so it does not just refer to walking in the context of 20 minute return trip but also cycling and public transport.

Kyle Worgan (0272)

Modify paragraph 3.195 to the following;  
Facilities such as schools/lifelong learning, green spaces, community gardens, sport and recreation, local doctor and dental surgeries, local shops, community halls and shared work/meet spaces, public toilets and water fountains, are necessary to foster community life support health and wellbeing and reduce the need to travel for everyday services, therefore should be protected and enhanced.

Andrew Gray (0388)

No modification identified

Edinburgh Chamber of Commerce (0379)

Modification Plan so that 20 minute neighbourhoods should make reference to the future of the city centre.

Crosswind Developments Ltd (0184)

Modify Policy as follows:

“Housing development will be supported where key community facilities are walkable\*, wheelable\*\* or cyclable\*\*\* within a 20-minute return trip. Applicants must demonstrate this through an assessment of distances to key services and infrastructure. Proposals for

housing in areas that do not currently meet this walking, wheel or cycle distance will be considered only where these services can be delivered, relative to the scale of development, and managed as an integral component of a mixed-use development.

In areas that do not currently meet this walking, wheel or cycle distance, opportunities to provide services will be considered where these meet other policies in the plan. Wherever possible, delivery of new community facilities

should be as part of multi-service hubs that brings community services together, increasing opportunities for linked trips where the long-term sustainability of the facilities is prioritised. Proposals for new schools provide the opportunity to consider the integration of community services provision.

\* our analysis is based on a walking trip of 800m

\*\* an acceptable distance for wheeling for 10 minutes would be xxxxm

\*\*\* an acceptable distance for cycling for 10 minutes would be xxxxm”.

Cynthia Shuken (0632)

Modification not specified by implies modifying paragraph 3.195 to include allotments in list of amenities.

## **Inf 2 Loss of Community Facilities**

Ratho and District Community Council (0289)

Modify Policy to allow an extension of an existing facility as an alternative to the loss of a community facility.

Homes for Scotland (0404) Barratt David Wilson Homes (0677), Steve Loomes (0767), Wright PDL (078)

Modify plan to clarify how a “valuable community facility” will be identified.

Cala Management Limited (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Modify plan to remove all references to 20 minute neighbourhoods.

Cynthia Shuken (0632)

Modification not specified by implies modifying paragraph 3.195 to include allotments in list of amenities.

## **Summary of responses (including reasons) by planning authority:**

### **Inf 1 Access to Community Facilities**

Archie Clark (0003), Juniper Green and Baberton Mains Community Council (0306)

Policy Inf 1 support development where key community facilities are walkable within a 20-minute return trip. Paragraph 3.195 gives examples of community facilities. The Council considers that water fountains and public toilets constitute community facilities. Policy Inf 1 requires that where possible, delivery of new community facilities should be part of a multi-service hub bringing together community services and increasing opportunities for linked trips. It highlights that schools provide the opportunity to consider the integration of community services provision. **No modification proposed.**

Cala Management Limited (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Scotland's Draft Fourth National Planning Framework (NPF4) (CD099) was published in November 2021. Although NPF4 at this time has not yet been approved it gives a clear steer on the direction that Scottish Government's national policy is heading and it would be remiss of the Council not to give cognisance to its draft provisions for two reasons. Firstly, it is likely to be approved during the Plan's examination stage. Secondly, the Plan covers the period up to 2031 and will have the role of implementing the Government's national strategy. The examination phase will give the reporters the opportunity to amend the provisions of the Plan should the draft provisions of NPF4 be altered to an extent that the Plan was inconsistent with approved National Policy. The 20 minute neighbourhood concept is embedded within the review of NPF4 as a means of transforming the way Scotland's population will live in the future, by creating places with good quality homes close to local facilities and services. **No modification proposed.**

The Council considers that whilst the term '20 minute neighbourhoods' was not used in Choices for City Plan 2030 it is clear that the principles and concept were, in terms of promoting high density, mixed use neighbourhoods supporting good services, active travel and public transport demand to connect to the wider area and with an emphasis on brownfield land. In addition, the provisions of the 1997 Act (CD101) require the Council to take into account the National Planning Framework, and as it does not specify that it has to be approved it would be remiss of the Council not to take account of an emerging NPF. The Act also allows the Council to have regard to such other information and considerations as appear to be relevant when preparing a LDP, and the NPF4 Position Statement (CD098) and the draft NPF4 are, in the Council's view, a relevant consideration. When the NPF4 is approved by Scottish Ministers it will become a statutory part of Development plan and the Council considers that the Plan must developed in conjunction with it. **No modification proposed.**

Hallam Land Management (0615), Tarmac (0244)

The Council welcomes the support in principle for the 20 minute neighbourhood approach. For the purposes of the policy the Council considers the reference to 800m is approximate, as the speed at which people walk is variable. The Council considers a reference to 'approximate' is unnecessary as it is implicit. **No modification proposed.**

The Council considers the policy sets out requirements. Any exception to this will have to be justified through supporting evidence and considered through the planning application process. The Council considers the reference to "managed" in the policy relates to delivery of a proposal and not long term management of a community facility. **No modification proposed.**

Paragraph 3.195 gives examples of community facilities. The Council considers that water fountains and public toilets constitute community facilities. **No modification proposed.**

Policy Inf 1 does not refer to specific facilities. this provides flexibility in terms of implementation. The text set out in paragraph 3.195 gives examples of community facilities. The individual circumstances will vary depending on the location of a proposed development and proposals will be considered on their individual merits taking into account various factors including healthcare facilities. The Council is working in partnership with the NHS and an up to date Healthcare Assessment (CD017) has been published, which sets out the impacts of proposed housing led mixed use allocations within the plan and the required infrastructure actions to address the impacts. The results from the Assessment will inform the Action Programme and provide a steer for developers bringing forward development proposals. Supporting paragraph 3.194 states, "The intention of the following policy is to ensure that new housing development is directed to where residents can access a range of key services within walking distance *when this is practicable and reasonable.*" As a result, the Council considers the policy has sufficient flexibility. **No modification proposed.**

Shortbread House of Edinburgh Ltd (0619)

The Strategy of the plan is to take a place based approach to future growth. It seeks to do this by delivering a network of 20 minute neighbourhoods (Aim1), by directing new development to and maximising the use of brownfield land rather than greenfield land (Aim 2), and by delivering Edinburgh's key economic land use needs by providing land for modern business as part of housing led mixed-use development (Aim 10). A key aim of the strategy, in circumstances where an allocated site already has existing businesses on it, is to seek to retain businesses where compatible with a residential environment as part of a mixed use development. As a result, there is no need to refer to businesses with Policy Inf 1, which is seeking to ensure new development, as part of 20 minute neighbourhoods concept, has access to community facilities. **No modification proposed.**

Barratt David Wilson Homes (0677), Wright PDL (0078), Robertson Residential Group (Steve Loomes) (0767)

The Council considers that the concept of 20 minute neighbourhoods, as defined in draft NPF4, is based on a 20 minute walk time, which is approximately 800m. It is not intended that access to community facilities is limited to just walking, rather the policy uses walking time as a means of defining distance between a proposed development and community facilities. Including a reference to cycling or public transport in the policy would be confusing, as the distance travelled in 20 minutes by cycle or public transport would involve a distance greater than 800m. As a result, the Council considers the proposed policy is reasonable and justified.

The Council welcomes support for the concept of walkable neighbourhoods. Draft NPF4 (CD099) states that the 20 minute neighbourhood principle can be adjusted to include varying geographical scales from cities and urban environments to rural and island communities. As a result, the Council disagrees that greenfield sites are better able to deliver these neighbourhoods or that they are unlikely to workable in practice in every place. The Council considers the policy sets out requirements. Any exception to this will

have to be justified through supporting evidence and considered through the planning application process. Supporting paragraph 3.194 states, “The intention of the following policy is to ensure that new housing development is directed to where residents can access a range of key services within walking distance *when this is practicable and reasonable*.” As a result the Council does not agree greater flexibility is required and considers additional flexibility would undermine the concept contrary to the intentions of draft NPF4. **No modification proposed.**

The Council has now established a dedicated 20 minute neighbourhood multidisciplinary team to progress and develop various initiatives e.g. public realm, active travel, mobility hubs etc to support and deliver the 20 minute neighbourhood approach across the city within existing urban form. **No modification proposed.**

Ambassador Group (0683)

The Council welcomes support for the concept of walkable neighbourhoods. The Council does not agree further flexibility is required for the reasons set out in its response to 0677 above. **No modification proposed.**

E&A Partnerships Ltd & Niddrie Development Company Ltd (0753)

The Council welcomes support for the concept of walkable neighbourhoods. The Council considers the definition of a 20 minute round trip in the Plan is consistent with draft NPF4 (CD099). In the context of 20 minute neighbourhoods NPF4 identifies a distance of 800m, which is approximately 10 minutes walking time, i.e. a 20 minute round trip. **No modification proposed.**

Steve Loomes (0767)

The Council agrees that new housing allocations can play a role in the provision of services to existing neighbourhoods as well as new ones.

The Council welcomes support for the concept of walkable neighbourhoods. The Council does not agree further flexibility is required for the reasons set out in its response to 0677 above. **No modification proposed.**

Cockburn Association (777)

Paragraph 3.203 relates to parking and the Council assumes that the comment is in relation to paragraph 3.195. The Council considers the provisions within the plan are sufficient to deliver the strategy with regard to community facilities and therefore has no intention of providing separate guidance. **No modification proposed.**

NHS Lothian (0596)

The Council has and will continue to work in close partnership with NHS Lothian to deliver the strategy of the plan. The Council has worked closely with NHS Lothian, as part of the Edinburgh Health and Social Care Partnership, in the context of the primary health care appraisal as referred to in paragraphs 2.125 and 2.126 of the Plan. The updated appraisal (CD017) identifies the impacts of new development sites on primary care provision and identifies the healthcare infrastructure actions required to address

these impacts. The Council will continue to work with the Partnership in the context of the action programme, developer contributions and planning guidance in order to deliver new health care infrastructure alongside the development. Whilst the Council puts great value on this partnership it does not consider it necessary to refer to that in the context of Policy Inf1, which has the role of setting out policy to ensure new housing development is directed where residents can access a range of key services within walking distance when this is practicable and reasonable.

The Council agrees that it is important to consult with communities and aim 9 of the Plan states that where new infrastructure is required, the Council will take a consultative approach with communities to address future healthcare and education requirements. In addition, in the areas of the City where the Council is preparing place briefs the Council will engage with communities as part of that process. Finally, there is an existing requirement for developers to consult on major development proposals they are bringing forward and this would give an opportunity for communities to give an input on community facilities as part of that process. As a result, the Council considers that the development strategy has consultation with communities imbedded within the Plan and therefore there is no need to include a specific reference within Policy Inf 1.

As set out in its response to 0596 above the Council considers the plan is already seeking to provide necessary health care facilities as part of the strategy, to address the impacts of development. In addition, Policy Inf 3 on infrastructure delivery and developer contributions is seeking developer contributions towards healthcare facilities. As a result, the Council considers that support for health care facilities is implicit within the plan and additional supportive policies are unnecessary. The Council notes that Midlothian Council do not seem to have worked in partnership with the NHS to prepare a healthcare appraisal to identify the healthcare infrastructure required as part of the plan's strategy, and presumably have taken a decision to include supportive policies as an alternative.

The Council considers the plan should be read as a whole. The provisions of the plan with regard to sustainable energy and heat networks is set out in Policy Inf16 and there are numerous policies addressing transport infrastructure. **No modification proposed.**

#### The Davidson Mains and Silverknowes Association (0454)

The Strategy of plan is to take a place based approach to future growth. It seeks to do this by delivering a network of 20 minute neighbourhoods (Aim1), and by directing new development to and maximising the use of brownfield land rather than greenfield land (Aim 2). Policy Inf1 sets out policy requirements for new housing to ensure good access to community facilities. Where new housing developments are being brought forward within the Davidson Mains area there will be an opportunity to improve access to community facilities as part of that process. In addition, the Council has now established a dedicated 20 minute neighbourhood multidisciplinary team to progress and develop various initiatives e.g. public realm, active travel, mobility hubs etc to support and deliver the 20 minute neighbourhood approach across the city within existing urban form. **No modification proposed.**

#### Scottish Property Federation (0144)

As referred to in the Council's response to 0465, 0599 and 0649 above, the 20 minute neighbourhood concept is embedded within draft NPF4 (CD099) as a means of

transforming the way Scotland's population will live in the future, by creating places with good quality homes close to local facilities and services. Draft NPF4 states that the 20 minute neighbourhood principle can be adjusted to include varying geographical scales from cities and urban environments to rural and island communities. The Council considers the policy sets out requirements. Any exception to this will have to be justified through supporting evidence and considered through the planning application process. Supporting paragraph 3.194 states, "The intention of the following policy is to ensure that new housing development is directed to where residents can access a range of key services within walking distance *when this is practicable and reasonable*." As a result, the Council considers the provisions of the plan have sufficient flexibility and it will not result in investment being attracted to alternative locations or negative consequences for regeneration. **No modification proposed.**

#### Homes for Scotland (0404)

The Council considers the reference to walkable 20 minute neighbourhoods is reasonable for the reasons set out in the Council's response to 0677 above.

Draft NPF4 (CD099) states that the 20 minute neighbourhood principle can be adjusted to include varying geographical scales from cities and urban environments to rural and island communities. As a result, the Council disagrees that greenfield sites are better able to deliver these neighbourhoods or that they are unlikely to workable in practice in every place.

The Council has now established a dedicated 20 minute neighbourhood multidisciplinary team to progress and develop various initiatives e.g. public realm, active travel, mobility hubs etc to support and deliver the 20 minute neighbourhood approach across the city within existing urban form. **No modification proposed.**

#### Kyle Worgan (0272)

The Council considers the plan should be read as a whole. Improving health and well being is an underlying part of the strategy of the plan as set out in paragraph 2.35 of the plan. **No modification proposed.**

#### Andrew Gray (0388)

Further information on 20 minute walkable neighbourhoods is set out in Policy Inf 1 and the support text in paragraphs 3.193 and 3.194. A definition is also provided in the glossary. **No modification proposed.**

#### Edinburgh Chamber of Commerce (0379)

The Council considers the provisions of Inf1 will apply across the whole city. Therefore, the Council considers a reference to the future of the city centre with regard to this policy is unnecessary. The important role of the city centre, including its role as a regional shopping centre is highlighted in the plan e.g. paragraph 2.145. The Council does not agree that the 20 minute neighbourhood approach is being pursued at the expense of the city centre and it is important that the plan is read as a whole. **No modification proposed.**

Crosswind Developments Ltd (0184)

The concept of walkable neighbourhoods is based on a 10 minute walking distance or 800m. The suggested changes are not consistent with the concept of 20 minute neighbourhoods as defined in the draft NPF4. It is not intended that access to community facilities is limited to just walking, rather the policy uses walking time as a means of defining distance between a proposed development and community facilities. Including a reference to cycling or public transport in the policy would be confusing, as the distance travelled in 20 minutes by cycle or public transport would involve a distance greater than 800m. As a result, the Council considers the proposed policy is reasonable and justified. **No modification proposed.**

Cynthia Shuken (0632)

The Council considers the list of facilities in paragraph 3.195 are examples rather than a comprehensive list and allotments are considered relevant community facilities in the context of Inf1. It should be noted that the Plan has identified the need for various new allotments in Table 1 Environment Proposals and therefore the Council is supportive of providing allotments to meet community needs. **No modification proposed.**

**Inf2 Loss of Community Facilities**

Ratho and District Community Council (0289)

The Council agrees that it is important to consult with communities, which is one of the aims of the strategy, and is a requirement of the plan as set out in further detail in the Council's response to 0596 above.

The Council considers there is sufficient flexibility in the wording of Inf2 to support an extension of an existing facility under criterion b or c. The policy could not be applied to proposals which are being progressed under permitted development rights. **No modification proposed.**

Homes for Scotland (0404)

The wording of Policy Inf2 is largely the same as Policy Hou10 in the adopted LDP which was subject to examination. A definition of community facility is provided in the glossary of the Plan. The Council considers a "valuable community facility" will be an existing facility that is or was recently in active community use, the loss of which would leave or has left, the community adversely effected and disadvantaged. **No modification proposed.**

Cala Management Limited (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The Council has set out its position with regard to draft NPF4 (CD099) in its response to (0465), (0599) and (0649) under Inf1. **No modification proposed.**

Barratt David Wilson Homes (0677), Steve Loomes (0767), Wright PDL (078

The Council has addressed this point in its response to 0404 above. **No modification proposed.**



Cynthia Shuken (0632)

The Council has addressed this point in its response to 0632 above in the context of Inf1.  
**No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 29	Infrastructure Delivery - Education policy	
Development plan reference:	Education policy and proposals	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>APS Group (Scotland) Ltd (0518)</div> <div>Archie Clark (0003)</div> <div>Barratt David Wilson Homes (0677)</div> <div>BDW Trading/Taylor Wimpey (0199)</div> <div>Bo Adams (0363)</div> <div>CALA Management Ltd (0465)</div> <div>Cramond &amp; Barnton Community Council (0243)</div> <div>Defence Infrastructure Organisation (0124)</div> <div>Edinburgh Airport Limited (0761)</div> <div>Forth Ports Limited (0496)</div> <div>Frances Guy (0589)</div> <div>Genna Spears (0081)</div> <div>Hallam Land Management (0599)</div> <div>Helen MacLeod (0364)</div> <div>Homes for Scotland (0404)</div> <div>Howard Jones (0424)</div> <div>Iain R N Stewart (0131)</div> <div>Ian McRae (0028)</div> <div>Inverdunning (Hatton Mains) Ltd (0427)</div> <div>Jacqueline Christie (0023)</div> <div>Liberton &amp; District Community Council (0084)</div> <div>Lynn Grattage (0362)</div> <div>Michelle Mckinley (0432)</div> <div>Miller Homes (0256)</div> <div>Miller Homes Limited (0649)</div> <div>Miller Homes Limited and Wheatlands Farming Partnership (0592)</div> <div>Mrs Patricia Scott (0349)</div> <div>Newcraighall Heritage and Residents Association (0759)</div> <div>Newcraighall LLP (0466)</div> <div>Padraic Kinsella (0298)</div> <div>Police Scotland / Scottish Police Authority (0659)</div> <div>Robyn Kane (0091)</div> <div>Ryden LLP (0578)</div> <div>SAICA (0590)</div> <div>Shiela Strathdee (0448)</div> <div>Sir Jack Stewart-Clark (0800)</div> <div>Steven Loomes (0767)</div> <div>Stirling Developments Limited (0303)</div> <div>Suzie Ross (0440)</div> <div>The Davidson's Mains and Silverknowes Association (0454)</div> <div>Tony Gray (0291) – No comments provided and ‘unsure of support’ for Education Proposals non-specific</div> <div>West Craigs Limited (0472)</div> <div>West Town Edinburgh Ltd (0660)</div> <div>Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	Education policy and proposals	
Planning authority’s summary of the representation(s):		
<p><b>Promoted Education Proposals not in City Plan</b></p> <p><b>New High School, Primary School and Nursery as part of new development east of Kirkliston</b></p> <p><u>BDW Trading/Taylor Wimpey (0199)</u></p> <p>Taylor Wimpey &amp; Barratt &amp; David Wilson Homes (BDW) are joint venture partners who control the site known as Almondhill.</p>		

Miller Homes Limited and Wheatlands Farming Partnership (0592)

Miller Homes Limited and Wheatlands Farming Partnership are promoting an area of land identified as Kirkliston East.

BDW Trading/Taylor Wimpey (0199), Miller Homes Limited and Wheatlands Farming Partnership (0592)

The Almondhill site promoted in (0199) pertains to an area within the overall Kirkliston East site promoted as part of (0592). It is noted that both representations are in agreement that the promoted development promoted development can incorporate a new Secondary School and primary school. Other parts of these representations are promoting the development sites more generally, including for residential development, and these comments are addressed in Issue 9. Both representation do however make comments in support of a promoted proposal for a secondary school and these are addressed below.

BDW Trading/Taylor Wimpey (0199).

Children from houses in the promoted site will add significantly to the new school's roll, ensuring it's sustainability. This could be added to further by catchment reviews to bring in pupils from smaller communities such as Ratho Station, relieving pressure on existing High Schools, and reducing longer distance travelling to schools.

BDW Trading/Taylor Wimpey (0199), Miller Homes Limited and Wheatlands Farming Partnership (0592).

Sir Jack Stewart-Clark (0800)

The Council accepts that two High Schools, each of 1,200 pupil capacity are required in West Edinburgh. This is due to the allocation of additional housing land and the fact pupils at Kirkliston presently go to South Queensferry High School which will exceed capacity by 2025.

The Council understands the potential benefit of this site in helping deliver a new High School and have expressed an interest in this site accordingly. BDW/TW have been working with them to progress proposals, including a masterplan and Almondhill Vision Document.

Despite this there are no specific proposals for High Schools in West Edinburgh in table 11 detailing Education Infrastructure, nor are they identified on the Proposals Map.

Appendix B of the Council's Education Committee Report dated 7th December 2021, sets out the issues around the identification of sites for new West Edinburgh High Schools. Attention is particularly drawn to paragraphs 1.25 to 1.43. This appendix notes four potential options for discussion for which secondary school Kirkliston primary school should feed into:

- 1) An extended Queensferry High School;
- 2) A new High School in or around the Kirkliston urban area;
- 3) A new West Edinburgh High School;
- 4) Another existing High School either in West Edinburgh or West Lothian.

The report provides further discussion of these options, however it can be summarised that all these apart from option 2, are very difficult and/or impractical for one reason or another.

In contrast, the only difficulty identified for the Kirkliston location is the site is in the Green Belt and is associated with new housing. It is questioned why this is a problem given the IBG and Bioquarter housing allocations are greenfield.

The appendix also notes a new High School may not be provided early in the phased delivery of new West Edinburgh Development sites set out in City Plan and the difficulties this would create. Even allowing for careful management of non-catchment places and catchment change, Craigmount High School may require temporary accommodation before a new high school is delivered.

The non-allocation of a High School in Kirkliston creates the very real possibility that Kirkliston children will not have an adequate High School to attend and could well be accommodated in temporary units in the short/medium term, and thereafter attend a school some considerable distance from where they live. Clearly that contradicts the Council's objective to create 20-minute neighbourhoods.

#### Miller Homes Limited and Wheatlands Farming Partnership (0592)

A financial contribution toward the provision of a Serviced site for the new Secondary School will be required from the Council. This would be proportionate to the level of pupils from existing homes that would attend the new school.

#### BDW Trading/Taylor Wimpey (0199), Miller Homes Limited and Wheatlands Farming Partnership (0592)

A new primary school will likely be needed to provide capacity, in particular for children generated from the Kirkliston East development and the proposed development can incorporate this alongside nursery provision. The realistic maximum size likely to be needed would be a three-stream school on a 2ha site however in the first instance a two-stream school would be provided for initial development- with this being able to be extended at a later date if needed.

It is likely that the optimal scenario for accommodating these would be to combine education provision in a single campus of circa 8ha.

#### Miller Homes Limited and Wheatlands Farming Partnership (0592)

No new denominational schools are considered to be necessary on-site.

It is considered only around 80-100 new pupils would be generated in this regard, partly due to the effect of the new non-denominational primary within the site reducing demand for denominational school places. As a result there is considered to be capacity at the existing denominational primary school which can be extended if needed.

Existing denominational high school capacity will be exceeded and it is noted there are proposals to provide additional capacity in this regard. Details are still to be provided in this respect but it is considered that the promoted development at Kirkliston East can contribute to the emerging solution as a more appropriate capacity solution rather than providing an on-site denominational high school.

### **New Primary School at Hatton Village**

Inverdunning (Hatton Mains) Ltd (0427)

In order to serve the associated promoted development then a new primary school is needed.

### **Currie Community High School**

Archie Clark 0003

City Plan should be modified.

### **New annexe to Flora Stevenson's Primary School**

Helen MacLeod (0364)

Crewe Road South site is a wonderful opportunity to build a beautiful annexe and create outdoor learning spaces, plant for wildlife and enjoyment of being outside.

### **New Flora Stevenson Primary School at Royal Victoria Hospital Site**

Iain R N Stewart (0131), Suzie Ross (0440), Jacqueline Christie (0023), Howard Jones (0424), Ian McRae (0028)

Flora Stevenson's Primary School school is full to capacity every year, and the playground is very small, more tarmac than anything else. The building is old and not energy efficient. Research shows that school children and young people are suffering unprecedented levels of mental health issues. A calm school environment promoted by roomy well-designed classrooms and communal areas, access to green open spaces and Nature are needed. The Scottish Government's own Curriculum for Excellence stresses the value of the outdoor classroom, learning first-hand in the natural environment.

Current school at capacity and in an area with pollution problems (air and noise). Current Flora Stevenson School site is more appropriate for housing if housing is needed in this area.

### **New High School at Frogston Road**

Bo Adams (0363)

A new high school should be built at Frogston Road , there is too much of new development in the area , Frogston provides great area for a high school , could catch pupils from Buckstone , Feirmilehead , Liberton , Kaimes , Limes. New highs schools is desperately needed in this area

New Frogston primary should have a bigger brother in a form of a High School on Frogston road . If this enabled more houses to be built along Frogston road it would be better for the community overall , as long as new development also provides some shop and restaurant place and active infrastructure.

## **Education mitigation and/or new school provision associated with development at Riccarton Village**

### Miller Homes (0256)

The Education Appraisal, dated September 2021, considers the capacity of primary and secondary schools and where new and extended schools are required as a result of the City Plan. Although Riccarton Village has not been included in the appraisal, it is noted that there is spare capacity in some primary and secondary schools whose catchment area includes the site including Currie Primary School, Currie Community High School, and St Augustine's RC High School. This suggests that the Preliminary Education Infrastructure Note (Geddes Consulting) submitted by Geddes Consulting to the Choices for City Plan 2030 which included a comprehensive note on education infrastructure in the context of Riccarton Village and identified that there was sufficient capacity to support an initial phase of the development of the site, remains the case.

As also identified in the Preliminary Education Infrastructure Note (Geddes Consulting), education mitigation will be required as a direct and cumulative result of the development of Riccarton Village. 2ha of land will be made available to deliver a primary school at Riccarton Village. This is sufficient to accommodate up to a three- stream primary school and is considered to be the realistic maximum scale of school required.

The timing for the delivery of the school will be subject to detailed assessment, however, it will not be required at an early date due to the availability of interim spaces. If a denominational new primary school is required to serve the wider area, a joint campus primary school could be considered as part of the proposals.

Additionally, there may be a requirement to provide additional non-denominational secondary school capacity. If additional capacity is required, this may be delivered at the site of the replacement Currie High School, either as part of the initial replacement or future expansion. Alternatively, if this option was not feasible, if required, Riccarton Village could provide land for a new secondary school on site. This would need to be considered as part of a detailed feasibility study.

## **General across the City**

### Lynn Grattage (0362)

Insufficient information on what is being done to increase the quality of comprehensive schools in Edinburgh, and how many schools would be needed if the huge amount of children going to private schools had to go to comprehensives instead. It is indicated the Plan needs to do more to make the balance better for equality.

### Archie Clark (0003)

Nowhere is there a reference to the optimum size of school to suit pupil intake or size of efficient provision. Sizes seem more related to administrative convenience. A report by the CEC's Children and Families Department in 2006 advised that the optimum size of a secondary school was either 900 or 1200 pupils. Smaller schools would reduce the impact of closures to due outbreaks such as Covid. This is also in line with the '20-minute

neighbourhood' concept as it brings homes and schools closer together and would give more sense of 'community' to the settlement.

## **Education Proposals in City Plan**

### **FH1, FH2, ED7 and FH3**

#### Defence Infrastructure Organisation (0124)

Further information is needed. The education issues are far from resolved, and in particular, it is considered that insufficient justification has been provided for the siting, scale and location of the potential new annexe to Firhill High School.

The costs and any associated site for new school facilities needs to be proportionate and reasonable or they will be prohibitive to future development on the site. This is especially important for challenging development sites such as Redford where the high number of listed buildings and associated constraints impact development viability.

The DIO is particularly concerned with proposal ED7 / FH2 and the possible requirement for 2.3Ha of the Redford Barracks site to be for a new annexe to Firhill High School. The potential location for the high school annexe as the playing fields located at the South west of the Barracks site. This would remove a significant portion of the site which is free from heritage assets and which offers the opportunity to provide new build residential development which is vital in terms of development viability. This is recognised by Historic Scotland in its managing change guidance that sets out that in sites which have larger areas of open ground, some form of enabling development may be required to achieve the reuse of a listed building. The area indicated for the school is also vital for the development to provide a mix of new build family housing alongside the listed building conversations as these are likely to feature a high number of apartments given the scale and characteristics of the existing buildings.

The education appraisal shows that Firhill High School has a capacity of 1,150 pupil with a baseline peak roll of 1,251. This baseline projection shows that the school will be required to operate over capacity before the impact of new housing development is considered. 85 secondary school pupils are estimated to be generated from new development in the area from both the LDP 2016 and the City Plan (of which 77 are estimated to be from the Redford Barracks development). The education appraisal states that Firhill HS has a site area of 3.53 ha over a sloping site and shares sports facilities with the neighbouring Braidburn Special School. It states that a roll between 1,200- 1,400 requires a site area of 2.8 ha and 4 ha for playing fields. A site of 2.3 ha is proposed for the potential school annexe.

On the basis of the above, the requirement of an annexe of 2.3 ha clearly goes beyond what is necessary as a result of Redford Barracks development and is considered excessive to accommodate only an additional 186 pupils over the school's existing capacity. The impact of this on the Redford Barracks proposals therefore does not fairly and reasonably relate to the scale of development proposed and suggests that a proportionate financial contribution only would be more appropriate at this stage. The DIO questions what analysis has been undertaken in terms of accommodation needs at Firhill, what assessment has been undertaken in terms of extending the existing school and what other sites have been considered for a potential annexe.

Archie Clark 0003

Details should be provided on the physical nature of extension to the school and where this will be positioned.

**ED3/ECB1: Annexe at Crewe Road South to Flora Stevenson Primary School to provide additional primary and nursery places**

Police Scotland / Scottish Police Authority (0659)

Insufficient information provided to justify 0.8ha education provision on-site.

Appendix 2 of the EA projects the school roll to decline to 455 pupils by 2030. If the LDP pupils (16) and City Plan pupils (151) are then added to this in 2030 then the pupil roll would be 622 pupils and therefore within current capacity so no action is needed.

The proportions in Table 20 do not calculate out according to the numbers in Table 19.

There is no reference as to how the council procures the school site, the associated costs, transfer mechanisms, equalisation etc. This lack of detail is unacceptable and reflects a wider deficiency in information in this regard addressed further below in relation to the EA.

Notwithstanding the need for this proposal being unproven, co-locating an annexe with either an existing or proposed school could be a more appropriate, efficient, and cost-effective solution, for example at Broughton High School or on the Royal Victoria Hospital Site, which is being considered as a potential site for a new Gaelic High School. Have these options been considered?

Padraic Kinsella (0298)

Main issue is lack of consideration and forward planning for demand for Gaelic Medium Education places. This proposal appears contrary to ongoing discussions on potential sites for the GME secondary school which have yet to conclude regarding the same location. The potential for this site as a location for the GME secondary school has been raised by the Convener and Vice-Convener of the Education, Children and Families committee with the Cabinet Secretary for Education and Skills. It is disappointing to see this proposal which appears to present another choice between an English Medium Education (EME) provision and Gaelic Medium Education (GME) on the same site before the discussions with the Scottish Government have concluded.

**ERC1: 2 Classes to be provided at Holy Cross Primary School**

Police Scotland / Scottish Police Authority (0659)

Insufficient information provided to justify 0.8ha education provision on-site.

The school's capacity does not need to be increased as the Councils baseline projections show the school roll as declining to 179 pupils in 2030. Adding in the 108 pupils generated by the proposed new development would give a roll of 287 pupils - within the current capacity of 315 pupils.



Even if capacity needed to be created, a catchment review potentially remain as an affordable option for the Council.

#### **ED7/FH2 – 85 secondary pupils at Firrhill Secondary School**

Archie Clark 0003

The additional capacity is not defined in physical terms and it is unclear whether the site exists for this development. Where would the additional accommodation be provided?

#### **ECB4: Additional Secondary Capacity at Craigroyston High School and Broughton High School**

Police Scotland / Scottish Police Authority (0659)

The total of 1,521 pupils on the Broughton school roll includes 31 pupils not arising from the LDP or City Plan. The Council should be responsible for these, however the EA apportions the cost between the LDP and City Plan development sites.

Notwithstanding this, Broughton could have a capacity of 1,400 pupils within regulation once extended. Given the projected roll (with new development added) declines to 1428 pupils by 2030 then the extended school is likely able to meet the needs of the catchment considering factors such as placing requests and the fact the PGR used in the EA already over-inflates projections (see EA sub-issue below). As a result the solution to capacity issues in relation to ECB4 should be substantially less than the £15,256,610 estimated by the Council.

Iain R N Stewart (0131)

ED3/ECB4 points to the need for additional capacity for Broughton High but does not stipulate where.

#### **ERC8: Additional Secondary Capacity at St Thomas of Aquin's High School**

Police Scotland / Scottish Police Authority (0659)

The peak roll from the Baseline Projections shows 786 pupils, and this becomes 887 once the LDP and City Plan pupils are added (56 and 45 respectively). This is above the 750 pupil capacity, however this peak however is expected in 2022. The baseline projection shows roll declining to 596 by 2030. If the 101 pupils from the LDP and City Plan were added then it would result in a roll of 697 pupils i.e. within capacity. The need for a contribution is therefore unproven.

Notwithstanding this, a total contribution of £5,313,509 is stated however this cost is only broken down to contribution zones, but not to individual sites.

#### **ECB5: Additional Primary Capacity at St David's Primary School (1 Class)**

Police Scotland / Scottish Police Authority (0659)

Why has St David's Primary School referenced as CB5 and included within Craigroyston / Broughton rather than as an RC school in its own right and linked within the denominational secondary school numbers? It is therefore unclear if it is added to Broughton numbers, or St Thomas of Aquin's or both.

### **ED5/DLT2 – Bonnington / Jane Street Primary School**

#### APS Group (Scotland) Ltd (0518)

It is inappropriate and premature to identify a specific site for this school without assessing or justifying the site's suitability to accommodate a new school in any way, including regarding feasibility, availability of the site or land ownership.

In this regard, the proposed new school site covers the entirety of APS Group's business premises at both 21 Tennant St and (adjacent) at 88-92 Jane St. APS Group benefit from a favourable lease which has a further 5 years to run, and the intention is to remain in occupation. Building the school on the site where APS Group operate their business would have a significant negative impact - requiring them to vacate and relocate which would incur costs, cause great inconvenience, disruption and uncertainty. The proposed school is therefore not deliverable.

As an existing occupier of the proposed new school site at H41, APS Group wishes to take part in this forthcoming 'statutory consultation.' APS Group would welcome the opportunity for further discussions with CEC on the nature of and justification for the proposed education provision in respect of its sites at 21 Tennant St and 88-92 Jane St.

No explanation has been provided as to what analysis has been undertaken on school accommodation needs to arrive at the 1.2ha site requirement.

The Scottish Government has put renewed focus on a delivery-focussed planning system as set out in The Draft Local Development Planning Regulations and Guidance, particularly Part C. It is indicated that City Plan, particularly its proposals for Education, are not deliverable in this context as it is not clear about what is sustainable, desirable and achievable and they have not been developed through collaboration and based on robust evidence.

#### **Padraic Kinsella (0298)**

Significant new housing development is described in Section 4 of the Education Appraisal, and modelling of pupil generation for the Drummond, Leith, Trinity Contribution Zones indicates the need to expand existing schools and create 2 new primary schools.

Since opening in 2013, trends show that an increasing number and proportion of children attending Bun-sgoil Taobh na Pàirce live within the local catchments of Drummond, Leith and Trinity. In figures supplied in 2021 over 55%, 238 of a total roll of 418 pupils, of primary GME children now live within these zones, by comparison in 2018 this proportion was only 42.5%, and 148 children. If this trend continues, driven higher by local development, and the school reaches capacity this will potentially create an equity issue for families who wish to access GME from other parts of the city.

As such it is not unreasonable to link increasing demand in one part of the city with the need to provision new capacity in another part of the city with the appropriate redrawing of

catchment boundaries, indeed it has previously been the Council's plan to establish a second GME primary school at the JGHS Darroch annexe, and most recently through two new primary units at locations in the west and south east.

I also note proposals for Place 8 - Jane Street. Jane Street is adjacent to Edinburgh's GME primary school and nursery at Bun-sgoil Taobh na Pàirce. Included for Place 8 is an expectation that proposals "make provision for a new Primary School (1.2ha) and Nursery (0.3ha)." As this proposal is indicative of increased PGRs in the local area this gives me further cause for concern that local demand will also increase for places at Bun-sgoil Taobh na Pàirce, which itself is located on a site constrained by natural boundaries of Bonnington Road, adjacent housing developments, and Pilrig Park. Without consideration for this increased demand and appropriate action plans I worry that Bun-sgoil Taobh na Pàirce will more quickly exceed capacity thus limiting access for families in the locality and from other parts of the city.

A document with full background is attached.

Edinburgh Council took an important step forward in 2011 when all parties approved the establishment of Bunsgoil Taobh na Pàirce, Edinburgh's Gaelic-medium Education (GME) primary school. The Council's vision has been rewarded with the demand for GME increasing and this thriving school now operating at near capacity. The growth of GME in Edinburgh is a success story for this Council and has created a valuable asset for the city.

Edinburgh's GME children are part of the school estate in our city, they are the children of taxpaying Edinburgh residents, and their school accommodation is the responsibility of the local authority. The expansion in infrastructure required for GME should be considered within the context of the significant infrastructure projects required to meet rising rolls across the city.

Expansion of GME has led to the need to establish a standalone GME secondary school in Edinburgh. Parents with children in GME, have worked with the Council over many years to ensure parents' views are central to a successful proposal. A GME secondary school is not only essential in securing the 0 -18 immersive educational pathway parents seek for our children, it will also help to alleviate the aggregate rising roll at James Gillespie's High School.

In establishing a GME secondary school the importance of deliverability and funding has been emphasised on repeated occasions by Council Officers and Elected Members throughout these discussions.

Given the above context it is therefore disappointing that GME is explicitly excluded from the City Plan 2030 Education Appraisal. The omission of GME from these reports does not inspire confidence that the council is delivering on commitments of equality for Gaelic, and parity of esteem for children in GME.

#### **ED6/DLT4 – Waterfront Primary School**

Forth Ports Limited (0496)

City Plan identifies an 'indicative school proposal' with 1.3ha within the operational Port of Leith. This is entirely inappropriate for the following reasons:

1. Forth Ports continues to utilise its port land holdings for port and port related uses;
2. There has been no discussion with Forth Ports regarding the potential to locate a school within the Port of Leith despite being aware of point 1 above;
3. It is not a suitable location for a school. The Port is not open to public access as this would conflict with Forth Ports statutory and legal obligations and duties as a Statutory undertaker and port operator (appendix 2.2 Section 5);
4. The land is identified for business and industry in the proposed Plan;
5. A school is not compatible with the industrial and fluid nature of Port operations, with this reflected in Class 35 of Permitted Development Order (as amended) for port permitted development rights; and
6. The Port of Leith is the City's port and is the largest enclosed deepwater port in Scotland. It provides access to shipping, which is less carbon intensive form of transport than other modes and replaces many vehicle miles and so supports the City's ambition to be carbon neutral by 2030.
7. The Port provides full modern docking and cargo handling services for a range of vessels and cargoes. This infrastructure cannot be easily replicated and must be carefully nurtured.
8. 6. It undermines the important role of the Port of Leith's port infrastructure has at a city, city region and national levels:
  - At a National level, it supports essential actions to address the climate change emergency including supporting the off-shore renewables industry and, and which is recognised by national policy; and
  - At a City Region level, it supports a range market requirements.

## **ESW2 – Dean Park Primary School**

Archie Clark 0003

The proposal will increase the size to 21 classes (612 pupils). Does this exceed a recommended maximum size of a primary school?

## **ESW5 – Location unknown**

Archie Clark 0003

Where would this be located?

## **EWE10 – Craigmount Secondary School**

Archie Clark 0003

This school would have 1,684 places. A single school of this size would be beyond what the maximum size should be of 1200. Will catchment areas be redrawn to ensure this occurs? The impact of events like COVID shutting down schools was, more severe the larger the school. This will impact on family life with the possibility that parents will not be able to work during these periods. Therefore school capacities should not exceed 900, and that they should operate well within that number to allow for transfer of pupils between schools when closures occur.

Mrs Patricia Scott (0349)

The plans appear nebulous for the Edinburgh West area. For example secondary schools Craigmount, The Royal High to name two already have waiting lists. Provision for secondary and primary schools must be given priority in an future plans. Young people are our future and should be given the best educational opportunities.

**Roman Catholic : Additional RC primary school capacity (St. Josephs)**

Genna Spears (0081)

These extra capacities will not fully address the current problem of over-capacity, let alone for the extra children that will move into this area from the proposals in City Plan.

**Roman Catholic : Additional RC secondary school capacity (st. Augustines)**

Genna Spears (0081)

These extra capacities will not fully address the current problem of over-capacity, let alone for the extra children that will move into this area from the proposals in City Plan.

**Place 16 West Edinburgh Secondary School mitigation**

**EWE4 – West: Additional Primary School Capacity Turnhouse Road (SAICA)**

Ryden LLP (0578), SAICA (0590)

The proposed siting of a new Primary School should be reviewed further and a full comparative analysis undertaken based on education requirements as well as design principles for placemaking and most efficient patterns of use of land.

School catchment areas will also need to be assessed in further detail and the physical urban form of new development zones will need to take account of the scale, massing, space requirements and access requirements of a new school facility.

The potential to upgrade or extend existing schools within the catchment also requires further assessment to ensure there schools are located centrally and conveniently to the catchments within which they sit. This includes the new Maybury Primary School being constructed nearby to the north. This would be a better option than having two new schools so close together as more evenly spread schools reduce travel times and reduce issues of congestion at drop-off/collection times occurring in the same locale.

The education requirements for West Edinburgh need to be assessed on a holistic basis and subject to more detailed scrutiny in consultation with Education Officers. The potential for community hubs and potential to extend schools should also be considered where space is available.

Education contributions are accepted based on a formulaic response where the cost of school provision is clear. However, the full economic impact on viability of land take associated with a new school also needs to be considered. The net loss in value associated with reduction in gross and net developable area should also be factored when assessing the location of new schools.

Wider connectivity and access to open space and other community facilities and sports provision will also be important considerations in siting new schools.

#### SAICA (0590)

#### **No research on PGR for high density. Not appropriate to apply EA PGR to high density at W. Ed**

There exists practically no research into impacts of very high-density housing on pupil generation and there is no local research on the PGRs applicable. The Education Appraisal will have been predicated on average densities of new development pertaining in the last 14 years, in which the average will be closer to 30 - 40 houses/ha overall (including flats).

#### **High density of w. Ed/H59/H60 = less family homes and lower PGR**

The proposals for Edinburgh West are nearer to 90/ha. As a result, it is not appropriate to apply this PGR for West Edinburgh sites or for the SAICA site where the proportion of family homes would not exceed 20% i.e. the minimum level proposed by the Council for larger families (3+ bedrooms). In general areas, including those on which the EA's PGR will be based, the proportion of family homes will be higher.

#### **High density of w. Ed/H59/H60 = smaller units and lower PGR**

In addition, the individual size of units are generally likely to adhere to Council minimum standards i.e. about 20% smaller (95 sqm for a 3-bed flat compared to circa 110 to 120 sqm of existing housing stock throughout city). High density units regardless of bedspaces are historically less likely as family homes in relative terms due to the practicality of each flat to accommodate school-age children.

#### **W. Ed has other differences from PGR normative sample e.g. Build to Rent**

West Edinburgh is also more distinct from other sites, including those informing the evidence base for the appraisals PGR, when innovative concepts like Build to Rent (BTR) are part of the mix.

#### **Estimating an appropriate PRG for W. Ed**

It is estimated that, just as normal flat development reduces PGRs to 30% that of standard, the flat densities of Edinburgh West, at 50% higher (60/ha up to 90/ha) will reduce the PGA to, proportionately, 20%, bringing the PGA for the flats down to 0.07. A similar argument must apply to the 'family' houses of Edinburgh West. Their floor space configuration will, as with the flats, most likely be smaller than comparative existing housing stock, with likely limited external private space, and it is suggested that their allocated PGR be also proportionately reduced, from 0.348 to 0.232.

#### **Implication of applying the amended PGR to W. Ed**

The Educational Appraisal identifies a requirement for 2,281 more school places from the 11,000 total units. However, if 20% of the 11,000 units were family houses (a more realistic estimation), the pupil generation would be 1,681. If the PGRs are as proposed as suggested above, the number of pupils generated would be 1,126.

#### **Build out rate of 800 units per year = 80-120 pupils p.a**

If the West Zone achieves a build-out rate of around 800 residential units per year (one third of the City total), between 80 and 120 primary pupils are calculated to be generated annually, depending on the PGR applied (i.e. Council or revised proposed rate).

### **New school needed to meet demand**

As stands, in isolation, the current West Zone schools cannot accommodate the corresponding level of impact and a new school will be required in the first 5 years from commencement of development, over and above the new Meadowfield PS.

A second school would be needed five years thereafter.

### **Existing capacity freeing up**

In parallel however, there will be substantial spare capacity emerging in neighbouring schools from 2030 and beyond. Four schools in the West Zone (Blackhall, Carrick Knowe, Clermiston and Roseburn) remain well within capacity after accounting for new housing, and at 2030 are projected to have over 600 spare spaces. As Edinburgh West is rolled out, this spare capacity may become significant. It may justify a catchment review, before commitment is made to a second new school, and certainly before any potential third.

### **Need to monitor school rolls**

School Rolls must be monitored closely to observe (1) the existing capacities and (2) annual pupil generation from Edinburgh West. As Edinburgh West is rolled out, this spare capacity may become significant. It may justify a catchment review, before commitment is made to a second new school, and certainly before any potential third new school.

### **House occupancy to be monitored**

Occupancy of the Edinburgh West developments should also be monitored and kept under review to gauge incoming populations of school age children to measure the take up of the flats as family homes. This is important as densities of 90 units per hectare are unproven locally in terms of young buyers embarking on, or pursuing, a family life.

### **Benefits of monitoring**

A rate of build-out of around 800 completions p.a. in the West Zone allows time and adequate sampling to monitor the actual pupil generation rates from the high density developments. Only constant monitoring of occupancy trends, and future research, will determine what is a reasonable PGR. It may then be possible to adjust calculations accordingly for the timing of a second school, and for the Developer Contributions which will pertain. Such analysis should be conducted from the start, incorporating all completions and occupations in each phase of 'Place 16' housing

### **Interim projections**

Ahead of this information being available the Council should proceed with caution and utilize the more conservative PGR figures suggested above.

### **H59/H60 unsuited for school**

Locating the school within the SAICA site H59 is incompatible with the density aspirations for this site which are the highest for any in the West Edinburgh area.

Accommodating a new school in either H59 or H60 site would likely markedly reduce both the number of deliverable units and associated pupil generation from the sites. A new school site would be closer to 2 hectares (versus the 1ha referenced in the City Plan, assuming a minimum 210 pupil school) and consequently would be reduce available H59/H60 land for housing, which would further reduce the overall pupil generation (and

market/affordable housing delivery), potentially by as much as a third. This would further reduce the need for a school on the site.

### **Larger schools more efficient**

Moreover, most new schools are most efficiently funded to be 450 capacity, with an associated larger land take, emphasising the above factors further

### **Need for new school on site not justified; send children to other schools**

In light of the above, a new school to service H59/H60 is not justifiable, with the comparatively small sites generating an insufficient amount of pupils for a dedicated school (only 106 pupils according to the lower estimate of the representation). In light of this, and the additional fact of the inter-connectedness of Edinburgh West, it would be more appropriate to allocate H59/H60 pupils to one of the neighbouring school sites, new or existing. The H59/H60 sites would instead contribute to any justifiable education contributions in the normal way

### **EWE 13 - West : Additional RC primary school capacity (St. Andrews)**

Genna Spears (0081)

These extra capacities will not fully address the current problem of over-capacity, let alone for the extra children that will move into this area from the proposals in City Plan.

Cramond & Barnton Community Council (0243)

Additional information and surety needed that the additional capacity proposed will be delivered at early stage relative to the contributing housing development.

### **EWE7 - West: Additional primary school capacity (Gylemuir)**

Genna Spears (0081)

These extra capacities will not fully address the current problem of over-capacity, let alone for the extra children that will move into this area from the proposals in City Plan.

### **EWE3, EWE9, EWE10 - EWE13**

Cramond & Barnton Community Council (0243)

Substantial concerns about mismatch between the delivery of this additional capacity and the rate of current and future housing completions and that 'infrastructure first' objectives will not be met.

### **Place 16 West Edinburgh Secondary School mitigation**

### **EWE5 – West: Additional Primary School Capacity**

West Craigs Limited (0472)

H62 is located close to the proposed new Maybury Primary School which is



located to the north within the main West Craigs site. Connectivity between H62 and the school will be enhanced through the creation of a new active travel route over the railway line, via the pedestrian / cycle bridge consented under application 20/01148/AMC.

Connectivity to Craigmount High School is also good and will be further improved by the new active travel route.

Travel to both schools from H62 / West Craigs South can therefore be achieved in a safe and sustainable manner.

A recent report to the Education, Children and Families Committee (7th December 2021) titled 'Learning Estate Update' acknowledged that Craigmount High School has capacity until 2026. The report also notes that Craigmount "includes a high percentage of non-catchment pupils and the projections assume a continuation of this pattern". In response to this a 'catchment block' to release additional capacity within the school is mooted.

The report also acknowledges the potential to extend Craigmount High and the ability of an extended school to accommodate 1800 pupils and that a feasibility study has been undertaken confirming the school can be extended.

#### Crosswind Developments Limited (0184)

In relation to the text regarding education facilities (page 72), as well as the inclusion of education facilities on Map 24 (Page 73) – which include one new primary school and a potential new high school within the Crosswind (H61) boundary, we must emphasise that Crosswind Development Ltd engaged in the pre-application process with the council and throughout the planning application process and no proposal was put to the applicant regarding accommodating a primary or secondary school on site. Financial contributions toward new schools in West Edinburgh were requested. Notwithstanding this, the application description includes Class 10 (non-residential institutions) which in principle and as set out above CDL would be prepared to identify a plot/plots for new schools.

Nevertheless, CDL wish to object on the basis that there is excessive school provision identified. As set out in paragraph 3.60, CDL are concerned about the amount of education provision that has been attributed to West Edinburgh. For CDL's recent planning application (ref. 20/03210) which is currently at appeal (ref. PPA-230-2333), Communities and Families calculated that a total of 137 ND and D primary school aged pupils and 62 secondary aged pupils would be generated by the proposed development. This was based on a mix of 1, 2 and 3 bed flats.

CDL cannot understand therefore why the Education Appraisal includes for 456 ND primary aged pupils for the same number of units. Similarly, the IBG Phase 1 site that is currently with Scottish Ministers for determination is proposing only flats so it will not generate the 100 ND primary aged pupils set out in the Education Appraisal either.

Furthermore, Crosswind Development Ltd engaged in the pre-application process with the council and throughout the planning application process and no proposal was put to the applicant regarding accommodating a primary or secondary school on site. Financial contributions toward new schools in West Edinburgh were requested. Notwithstanding this, the application description includes Class 10 (non-residential institutions) which in

principle would mean that some school provision could be made within the scope of the current application but this would need to be subject to discussion and negotiation.

Edinburgh Airport Limited (0761)

An indicative location for a primary school is also identified within the airport's boundary on Map 24. It is not considered appropriate to propose in such a location without any consultation with the Airport and it is not considered an appropriate location for a school so close to the operational area of the airport with no regard to safe routes to school.

**EWE12 - West: Additional secondary school capacity (The Royal High)**

The Davidson's Mains and Silverknowes Association (0454)

Education Proposals Table 11 shows a deficit of only 2 places. This school is supported but it is noted that Education Proposals Table 11 shows a deficit of only 2 places and this is being used as a contribution to the total shortfall in West Edinburgh and justification for the need for a new secondary school in the west of the city.

Police Scotland / Scottish Police Authority (0659)

There is contribution of £105,218 for 2 secondary pupils in the Royal High School catchment area (WE12). This is a very high cost of solution for such a minor, and perhaps short term, level of capacity exceeded and raises questions over if more cost effective mitigation have been explored.

**LG5 and ELG 6 –Gracemont HS and Liberton HS: Additional Secondary school capacity**

Bo Adams (0363)

Liberton HS proposal will not cope with additional numbers. Liberton is also far from Kaimes and Gracemont. It is inferred from the representation that it is considered that even both Gracemont and Liberton proposals combined will not provide enough capacity.

Robyn Kane (0091)

Further details of the proposal need to be provided as to when it will be built and how many more pupils the school will be able to take on after the new school is built. It is also stated that this proposal should set out that the proposal should amount to a new school given the existing school is not fit for purpose.

**Extension to Newcraighall Primary School**

Newcraighall LLP (0466)

Object to the Map 32 Newcraighall/Brunstane layout making provision for an extension of Newcraighall Primary School's grounds. It was previously considered this ground would be needed for a school extension and provision for this was made as part of No.10/03506/PPP and the associated legal agreement. The Council has confirmed that

they now no longer require this land however and so the City Plan reference to this is out of date and not in line with school requirements .

#### Newcraighall Heritage and Residents Association (0759)

Newcraighall Primary School is due to close when the new school is built on the Brunstane housing area. The land reserved for the extension of Newcraighall Primary School playground was originally part of the open space required in the planning consent for the Avent Homes site. This should be preserved as such and not sold for building land in due course. It could be a community space or a rewilding project for wildlife refuge, due to the scale of new development in the area. The junctions at the A1 and around Fort Kinnaird become overloaded at peak times; the development should not be allowed to proceed until the tram network extends this far and the infrastructure has been fully upgraded.

### **Co-Location of Community Facilities and Schools**

#### Frances Guy (0589)

There is no commitment in any of the plans for community use of education facilities despite the benefits of local access to sports and other facilities being a key part of physical and mental wellbeing alongside facilitating greater community management of these.

### **Financial Contributions**

#### Stirling Developments Limited (0303), Ryden LLP (0578)

Further detail required on how contributions will be determined across all education provision. This must result in a clear formula of cost to the developer that links directly to the mitigation being contributed to.

### **Education Appraisal**

#### **Replication of flaws from rejected 2016 guidance**

Wright PDL (0078), Defence Infrastructure Organisation (0124), CALA Management Ltd (0465), Hallam Land Management (0599),

Miller Homes Limited (0649), Barratt David Wilson Homes (0677), Steven Loomes (0767)

The City Plan Education Appraisal (EA) follows the same flawed methodology, including cumulative approach detailed below, as used in the 2016 LDP Education Infrastructure Appraisal which supported the adopted Edinburgh Local Development Plan (LDP) (2016). The EA is principally based on its own experience of timetabling rolls and class organisations against available learning and teaching accommodating.

The previous appraisal was scrutinised as part of Scottish Ministers examination of the Council's draft Supplementary Guidance: Developer Contributions & Infrastructure Delivery (2018). Ministers directed the Council on 17th January 2020 not to adopt the Supplementary Guidance. This was because, amongst other matters, there was a lack of

compliance with Circular 3/2012. The education contributions had not been demonstrated to fairly and reasonably relate in scale and kind to the proposed development; nor reflect and be proportionate to the actual impacts of proposed development. In addition, there was not sufficient certainty that the contributions would always be used for the purpose for which they were gathered. It also does not address the more detailed concerns set out by Reporter Liddell in his Report to Ministers on the Supplementary Guidance.

By replicating these mistakes then the City Plan, Action Programme and EA do not meet the tests set out in Circular 3/2012. In particular the education contributions do not fairly and reasonably relate in scale and kind to the proposed development or reflect the actual impacts of specific developments such as Redford Barracks.

### **Lack of information and reservations: Pupil Generation Rates (PGRs)**

CALA Management Ltd (0465), Hallam Land Management (0599),  
Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West  
Town Edinburgh Ltd (0660), Barratt David Wilson Homes (0677)

In this regard, there is concern with the Pupil Generation Rates (PGRs) set out in the EA because, if these are too high, the level of infrastructure required will be overstated and not relate in scale or kind test in Circular 3/2012 nor the impact of pupils from new development.

The assessment to underpinning the PGRs is not provided in support of the EA or otherwise available in the public domain. This is very important since the PGRs adopted by the Council represent a significant increase to that applied by the Council in its adopted LDP Education Impact Appraisal, in particular the total primary school PGR has increased from 0.3 to 0.4 for houses and from 0.2 to 0.24 for secondary. A PGR of 0.4 for primary schooling is substantially higher than that applied by other councils across Scotland, which is on average around 0.3. The EA PGRs are also higher than the PGRs approved by the Council's Education, Children and Families Committee for use in statutory consultations on 21st May 2019 (the total primary PGR was 0.375 and for secondary was 0.23). It is considered that the PGR used in 2016 is a more appropriate figure, in line with national averages across Scotland.

The EA has not provided any indication as to how this applied within an actual forecast. It is also noted that a peak year is selected for identifying capacity exceeded rather than numbers at the last year of projection. This is critical when assessing the demands that new residential development has on catchment schools. New development cannot be held responsible/required to support excess occupancy/over capacity from previous development.

Wright PDL (0078), Defence Infrastructure Organisation (0124), Steven Loomes (0767),  
Homes for Scotland (0404)

Insufficient information has been published on the updated pupil per house'/flat rates used in the Education Appraisal. It is also not clear how accommodation standards have been calculated.

Insufficient information has been provided on the analysis of new LDP sites and the impact of these on the education estate and the relationship with new education mitigation.

In this respect, it is not clear how the pupils generated from individual developments have been calculated and in doing so, whether any regard has been given to the specific nature of sites and prospective developments. For example, Redford Barracks is site which is likely to feature a high number of apartments, which generate less pupils.

### **Lack of information: baseline school roll projections**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

The EA sets out existing and future capacity based by using a baseline school roll projection, however there is insufficient detail to understand how these baseline projections have been calculated.

Police Scotland / Scottish Police Authority (0659)

Figures 1a and 1b in the EA are misleading. The Council must confirm its methodology for both sets of projections. The Council should also provide more detail for its LDP and City Plan 2030 projections and break down admissions into catchment and non-catchment pupil numbers.

### **Lack of information: general concerns**

Wright PDL (0078), Defence Infrastructure Organisation (0124), CALA Management Ltd (0465), APS Group (Scotland) Ltd (0518), Hallam Land Management (0599), Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

The lack of information underpinning the EA, City Plan and Action Programme, including both PGRs and baseline data/projections, is a significant problem as this means there is insufficient information to justify the assumptions adopted or allow for meaningful consultation.

### **Flaws in Impact Assessment Methodology**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The cumulative approach used by the EA is known to overstate the number of pupils expected from new homes as confirmed in DPEA Appeal Decisions (PPA-390-2056 & PPA-230-2007). The number of homes expected is multiplied by the relevant PGR to derive a total number of pupils expected from new homes. The total number of pupils is then added to the projected baseline school roll to assess the need for new accommodation. This approach is not an appropriate way to measure the direct and cumulative impact of pupils from new homes for the following reasons:

1. It does not consider the progression or transitioning of pupils through school year groups over the development period for new homes. It assumes all pupils from new housing are in primary schools at the same time and in perpetuity. It fails to take account of pupils leaving primary school for secondary schooling on an annual basis. Ignoring this inflates the number of pupils in this type of impact assessment; and

2. Pupils can only be generated from new homes when they are completed and occupied. These completions occur over time, not all at once, as demonstrated by the housing land audit. The effect of this is that that pupil generation will fluctuate depending on the number of homes built each year. The EA methodology has not considered the impact of this.

### **Overstating impact**

Defence Infrastructure Organisation (0124), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

Based on the limited information provided, the Education Appraisal may well be overstating school roll projections, births and pupil generation rates. They appear to be greater than requirements necessitate and result in significant excess cost to developers.

Whilst a section 75 planning agreement could contain school roll tracking clauses to correct for overestimating impact to ensure provision is in line with demand and vice versa, this is not considered suitable. In particular it may influence scenario option planning and lead to poor scenario planning in that some options should already be ruled out as pupil numbers are over stated from the outset.

Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

The Council only provides summary baseline projections, picking out the maximum school roll over the projection period, even when there is sustained school roll decline projected as is the case for all of the catchment schools and St Mary's Edinburgh. Note: if primary school rolls are reducing then the demand for nursery places is also decreasing.

The EA implies that the baseline long term trend for pupil school rolls is that they are cyclical and table. This is not the case however as the projected proportion of children in the population is expected to decrease with National Records for Scotland (NROS) projecting a decrease of 1.9% from 2018 to 2028. This will mean less likelihood of pressure on school rolls and capacity. Data from recent years when incorporated may also show some wide fluctuations and COVID/Brexit may also suppress population growth.

As a baseline, the primary school roll projection without housing shows school roll decline but with recovery in the last 3-4 years of the projection however birth data show a decline of births and P1 admissions which the total primary school roll will follow. NROS confirms Edinburgh as having the lowest standardised birth rate and fertility rate in Scotland coupled with negative migration in the 0-14 age groups. Likewise, the projection shows roll recovery with the new housing feeding in, but the level of new housing has been increasing in recent years and yet school rolls have declined. The authority needs to demonstrate why it expects these roll changes can take place contrary to the aforementioned broader trends and projections. Note: if primary school rolls are reducing then the demand for nursery places is also decreasing.

Increases in secondary school roll through increased stay-on-rate are accepted as potentially increasing but not going to be comparable with the period 2002-2020 as most of the potential growth has already happened. The authority needs to demonstrate how these roll changes can take place.

CALA Management Ltd (0465), Miller Homes Limited and Wheatlands Farming Partnership (0592), Miller Homes Limited (0649)

It appears the Council's approach is designed to over provide capacity based on its cumulative approach. An example of this is from a new primary school at Gilmerton Station Road that was an Adopted LDP proposal. As a result of a Section 75B appeal, the Council conceded in a report to its Development Management Sub-Committee on 18th March 2020 that the need for this may not arise purely as a result of the development subject of the application or from other developments in the contributions zone.

If the Council's proposal is to overprovide capacity, this should be made clear and the costs apportioned between the Council and developer contributions to ensure that any resulting planning obligations accord with the tests of Circular 3/2012.

While existing and future capacity has been taken into account in the assessment through adding the total number of pupils from new homes to the baseline school roll projection, there is insufficient detail to understand how these baseline projections have been calculated.

### **Methodology for establishing capacity of schools**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), West Town Edinburgh Ltd (0660)

The Council does not adopt Scottish Government's Guidance on Determining Primary School Capacity (2014) when reporting on the capacities of its primary schools. Instead, it uses its own formula for calculating capacity which produces a lower capacity figure. The Council and EA do not explain this deviation however. This is despite the government guidance noting the benefits of a consistent forward planning approach across the country, particularly fairer and quicker negotiations in obtaining developer contributions and helping developers understand the implications of their development proposals.

### **Action Summary Table and Cost Schedule**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

The Cost Schedule sets out the cost assumptions for education infrastructure. The following matters which require explanation and justification from the Council:

- How the 12% uplift in costs for CEC Quality Uplift have been calculated or why this is justified;

- It is not clear if there is some double counting within the Scottish Futures Trust (SFT) metric, given Scottish Government's energy efficiency targets as part of the Learning Estates Investment Programme;
- How the 5% contingency has been calculated for new primary schools or why this is justified;
- The basis for indicative floor and site areas. It is presumed these may be based on the Councils Schedule of Accommodation however, this has not been provided as part of the Education Appraisal for consultation;
- How a cost per m2 of £5,365 for extensions to primary schools has been calculated, which is significantly higher than costs for new schools;
- How the indicative floor areas and site areas for the extensions have been calculated, these are significantly larger than required by the Schools Premises Regulations – especially for primary school extensions;
- There is no breakdown of the costs for a single classroom extension or dining hall;
- Why a higher contingency of 10% should be applied to extensions.
- Why 12.7 m2 per pupil has been applied to secondary school cost, which is higher than that advocated by the SFT metric based on existing secondary school sizes in Edinburgh; and
- How the abnormal costs, fees, quality uplift or contingency have been calculated for secondary schooling.
- What do RSR and EoMT stand for in the Action Summary table column headers?

The Council's Schedule of accommodation is greater than the area per pupil allowance made by SFT for both primary school and nursery. The Council has also only used the primary school cost metric and not that for Early Learning and Childcare (ELC). The Council is cherry picking SFT data.

The Council's schedule may be a standard that many of its existing schools do not meet and therefore using this schedule for new schools means there is a degree of aspirational cost that the Council is passing on to developers. The 2014 primary school capacity guidance provides a minimum area per pupil that can be applied to teaching spaces.

SFT recommends 11 sqm per pupil for an 800-1200 secondary school. The Council is exceeding this by 1.76 sqm; equating to an additional cost of £5509 per pupil before additions. The more recent base index adds £10 to the SFT sqm rate.

Information is needed on the accommodation schedules of Sciennes and Currie (from which the Council's aforementioned estimates are based on) as the Council could also be adding in measures to correct existing shortfall and passing these onto developers.

Many of the city's schools should not be/have been extended as they are already below statutory site regulations. Inner city schools are often unusual buildings with very high costs associated with design, maintenance and on-site construction. These have used a more recent index, with a slight bearing on costs.

Page 10 of the EA states that land values and remediation costs will be set out in the Action Programme. The Action Programme sets out no such details however.

No timescales are set out for the delivery of any of the Actions, how these actions relate to the delivery of new housing development or when these actions will be required to



accommodate pupils expected from new homes. The Action Summary must clearly show actions attributable to the City of Edinburgh and any capital funding from the Council.

Without information on costs, timing and triggers for infrastructure actions it will not be possible to draft a legal agreement for planning obligations and developers will not know the financial requirements of planning obligations when undertaking development appraisals and in designing proposals.

Overall, the accommodation standards would appear to be greater than requirements and at significant excess cost to the development industry.

### **Lack of detail defining Education Actions**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Many actions in the EA do not sufficiently define the specific infrastructure to be delivered. No further clarification provided in the Action Programme or City Plan. It is often just stated that capacity for a certain number of pupils is to be provided, but does not specify how, where or when this is to be delivered.

It is unclear how proposed costs have been established when the actual infrastructure action is not defined or how the Education Infrastructure proposals in Table 11 of City Plan can be assessed in terms of their suitability or impacts as part of this consultation or LDP Examination without this information.

As a result of the above it cannot be stated these actions are deliverable, nor it is not possible to judge if the actions relate to the impact of development or relate in scale or kind in accord with the tests of Circular 3/2012. As a result, the proposals set out cannot be used for planning obligations in legal agreements based. There is also a lack of certainty for developers whether they require to make allowances for education infrastructure on their site.

### **Feasibility assessment of proposed sites and review of alternative sites and options to address capacity issues**

APS Group (Scotland) Ltd (0518), Ryden LLP (0578), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

The Education Appraisal does not contain any consideration of other alternative site options, including within the Drummond/Leith/Trinity, Craigroyston/Broughton and West contribution zones. These areas might potentially be more suitable or why the proposed sites were preferable to alternatives. There particularly appears to be scope to extend some of the schools in Edinburgh within regulation to provide additional capacity efficiently, especially at secondary school level.

Such an analysis should be based on education requirements as well as access and design principles for placemaking and most efficient patterns of use of land for the school facility as well as any associated development.

A site-proving exercise should be undertaken before including the proposal in the City Plan, to ensure any new School is deliverable. CEC acknowledges this exercise is still to be undertaken.

The full economic impact on viability of land take and net loss in value associated with reduction in gross and net developable area should also be factored when assessing the location of new schools.

The site-proving and comparison analysis also needs to be done alongside a more detailed assessment of other options to address capacity issues, including reviews of school catchment areas and the potential to upgrade or extend existing schools within the catchment.

This holistic assessment process must consider the relative importance of ensuring that schools are located centrally and conveniently to the catchments within which they sit as well as achieving a certain level of pupil numbers to sustain the schools.

Wider connectivity and access to open space, sports provision and other community facilities should also be factors in the consideration of school options, as is the option to co-locate with community hubs.

The Council notes sustainability and carbon footprint should be considered in terms of catchment reviews however this is less of an issue with a move to electric and hydrogen powered vehicles this and when compared to the total carbon footprint of new school buildings on new school sites rather than extending and adapting existing buildings and maximising capacity within statutory limits

Undertaking a full and comparative analysis accounting for the issues above would increase the range of scenarios that the council could deploy to address short, medium and long term needs arising from the LDP and City Plan 2030.

### **Not appropriate to defer detail to SG**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Given the need to ensure that planning obligations are rooted in the development plan (paragraph 16, Circular 3/2012), it is not appropriate to reserve the detail of these requirements, including the level of financial contributions, to a later date through the preparation of supplementary guidance.

It is also unclear whether the Council will be able to bring forward such supplementary guidance before Section 22 of the 1997 Act is repealed and any subsequent transitional period. The Council has had difficulties with its timescale for adopting statutory supplementary guidance previously where it was directed by Scottish Ministers not to adopt its Supplementary Guidance on Developer Contributions on a number of occasions.

### **Errors in Appraisal**

The Davidson's Mains and Silverknowes Association (0454)

The brownfield development site at the former Clydesdale / Cleland garage sites may have been missed from the plan. This would result in an underestimating of impact and the numbers of required pupil places at the Royal High School, and also Davidson's Mains Primary.

Police Scotland / Scottish Police Authority (0659)

Various errors in the EA states, including that the number of units to be delivered on site H32 stated as 320 units however the suggested capacity under Housing Proposals H32 is 256.

The reference to the School Premises (General Requirements and Standards) (Scotland) Regulations 1976 (as amended)" is incorrect. The Council should refer to the statutory guidance issued in Scottish Executive Education Circular 3/2004 in relation to secondary schools.

Table 1 contains an error in the column headed "Stage" where it is assumed the third row should read Secondary and not "House".

The ordering by "Ref." results WE10, WE11 coming before WE2.

There contribution of £105,218 for 2 secondary pupils in the Royal High School catchment area (WE12) raises concern that there could be other very detailed anomalies hidden within the data.

The title for Table 19 incorrectly refers to Castlevew Primary School.

**Modifications sought by those submitting representations:**

**Promoted Education Proposals Not in City Plan**

**Proposed Education Campus on land to the East Kirkliston/Almondhill**

BDW Trading/Taylor Wimpey (0199), Miller Homes Limited and Wheatlands Farming Partnership (0592), Sir Jack Stewart-Clark (0800)

A proposal for a non-denominational High School in Kirkliston should be included in the Plan as part of an 8ha education campus also accommodating a non-denominational primary school and nursery.

**New Primary School at Hatton Village**

Inverdunning (Hatton Mains) Ltd (0427)

Include proposal for new Primary School as part of wider residential led proposal at Hatton Village. This school could be part of a Community Hub.

**Education mitigation and/or new school provision associated with development at Riccarton Village**

Miller Homes (0256)

No modification specified however it is indicated that City Plan confirm what education proposals are necessary to accommodate the promoted development at Riccarton Village and make provision for the relevant education proposals.

### **Currie Community High School**

Archie Clark 0003

The rebuilding of this school should be in the Plan and Action Programme with details on what level of funding is being provided and where this is coming from. It is also indicated that the proposal to be included in the plan should not necessarily be a full rebuild given the existing school is in good condition.

### **New annexe to Flora Stevenson's Primary School**

Helen MacLeod (0364)

The Crewe Road South site should be used to build an annexe with an outdoor learning spaces, plant for wildlife and enjoyment of being outside.

### **New Flora Stevenson Primary School at Royal Victoria Hospital Site**

Suzie Ross (0440), Sheila Strathdee (0448), Iain R N Stewart (0131)

The RVH site should be allocated for a new Flora Stevenson Primary School, with significant extra capacity than is needed to just meet current projection it is not too small before it is even completed.

It would be safe for children, easy to secure, have minimal need for vehicles access, allow retention of protected trees and biodiversity (including some protected species), have ample play areas and opportunity for outdoors teaching. The skyline would be protected also. There would be space, too, for the Gaelic School being considered. The existing school could then be redeveloped.

### **New Flora Stevenson Primary School at Crewe Road South site**

Jacqueline Christie (0023), Howard Jones (0424), Ian McRae (0028)

The site would be suitable for a new larger Flora's Stevensons PS with a large greenspace.

The old Flora's site could also be developed into affordable flats (not too many) with on site parking and extensive landscaping to assist with run off for flooding and nature.

Current school at capacity and in an area with pollution problems (air and noise). Current Flora Stevenson School site is more appropriate for housing if housing is needed in this area.

### **New High School at Frogston Road**

Bo Adams (0363)

New Frogston primary should have a bigger brother in a form of a High School on Frogston Road.

### **General City-wide proposals**

Lynn Crattage (0362)

It is indicated that the quality of comprehensive schools across Edinburgh should be improved and the number of these should be increased to accommodate private school pupils for the eventuality these children had to go comprehensives instead.

Archie Clark (0003)

Policy to ensure schools are retained at a comfortable size for their communities is needed for this plan.

### **Education Proposals in The Plan**

#### **West area primary schools general**

SAICA (0590)

Delete the requirement for 5 primary schools to serve the West Edinburgh allocations (Place 16). It is indicated this should be replaced with a reference to two or three primary schools at most.

#### **FH1, FH2, ED7 and FH3**

Defence Infrastructure Organisation (0124)

The proposed annexe should be removed from the site pending further assessment and consideration of all site options.

#### **LG5 and ELG 6 –Gracemont HS and Liberton HS: Additional Secondary school capacity**

Bo Adams (0363)

It is indicated that these proposals need to be supplemented or replaced by a new high school should be built at Frogston.

Robyn Kane (0091)

No specific wording proposed however it is indicated that further details of the proposal need to be provided.

**FH2 – 85 secondary pupils at Firhill Secondary School.**

Archie Clark 0003

It is indicated that details should be provided on the physical nature of extension to the school and where this will be positioned.

### **ED5/DLT2 – Bonnington / Jane Street Primary School**

APS Group (Scotland) Ltd (0518)

The education provision should be reviewed and all references the potential new primary school under ED5/DLT2 should be deleted, pending further assessment.

We request the Plan is changed to remove this proposed new primary school from Part 4 Education Infrastructure Proposal Table 11, from the development principles diagram Place 8 – Jane Street (map 22 on page 60), the Proposals Map and all other associated documents, until school requirements are more resolved and fully justified. Jane St Development Principles criteria c) 'Make provision for a new primary school (1.2ha)' should be deleted pending further assessment/evidence on educational needs and an assessment of all potential suitable sites.

The development principles diagram should be amended to annotate that it is 'indicative at this stage,' as the precise location and form of development will ultimately be defined through planning applications and future master-planning.

Padraic Kinsella (0298)

The Council should review the Education Appraisal with respect to GME schools, to validate the approach and to ensure that adequate action plans are in place for future years to secure the funding needed to ensure every child accessing GME can be educated according to their parents' wishes as the city develops and grows.

### **ED6/DLT4 – Waterfront Primary School**

Forth Ports Limited (0496)

Identify an alternative location, outside the operational Port of Leith for the proposed new Waterfront school – ED6 DLT4 which can be delivered without significant impact on port infrastructure.

### **ESW2 – Dean Park Primary School**

Archie Clark 0003

It is indicated that the school should not be extended to the size proposed due to the size of primary school being created being too large.

### **ESW5 – Location unknown**

Archie Clark 0003

Details should be provided on where this would this be located.

## **EWE10 – Craigmount Secondary School**

Archie Clark 0003

It is indicated that this school should not be extended to the large size proposed.

Mrs Patricia Scott (0349)

No modification proposed however it is indicated that education proposals should be the greatest priority in the planning of development.

## **ERC4 - Roman Catholic : Additional RC primary school capacity (St. Josephs)**

Genna Spears (0081)

No specific wording is provided but it is indicated that a greater level of additional capacity needs to be provided than is proposed by providing greater extensions and/or additional schools. If this is not done then housing proposals in the catchment should be removed from the plan.

## **ERC7 - Roman Catholic : Additional RC secondary school capacity (st. Augustines)**

Genna Spears (0081)

No specific wording is provided but it is indicated that a greater level of additional capacity needs to be provided than is proposed by providing greater extensions and/or additional schools. If this is not done then housing proposals in the catchment should be removed from the plan.

## **EWE4 – West: Additional Primary School Capacity Turnhouse Road (SAICA)**

### **Place 16 West Edinburgh Secondary School mitigation**

Ryden LLP (0578)

It is indicated that the proposed school should be deleted from the plan pending a review of the siting of the school and a full comparative analysis undertaken based on education requirements as well as design principles for placemaking and most efficient patterns of use of land.

SAICA (0590)

The proposed school should be deleted from the plan.

## **EWE5 – West: Additional Primary School Capacity**

### **Place 16 West Edinburgh Secondary School mitigation**

West Craigs Limited (0472)

It would be appropriate to link any developer contributions for new school infrastructure arising from the development of H62 to Maybury Primary and Craigmount High. It has

been demonstrated both schools are easily accessible from the site and, crucially, have sufficient capacity. We consider the approach proposed within Proposed City Plan 2030 would result in significant delays to the delivery of educational facilities for pupils of H62, and therefore request that this approach is amended within City Plan 2030.

Edinburgh Airport Limited (0761).

The indicative location for a primary school is not appropriate and should be removed from the map or reallocated in a suitable position within the proposed residential areas of development.

Crosswind Developments Limited (0184)

No modification proposed however it is indicated that the level of school provision should be reduced.

**EWE7 - West: Additional primary school capacity (Gylemuir)**

Genna Spears (0081)

No specific wording is provided but it is indicated that a greater level of additional capacity needs to be provided than is proposed by providing greater extensions and/or additional schools. If this is not done then housing proposals in the catchment should be removed from the plan.

**EWE3, EWE9, EWE10 - EWE12**

Cramond & Barnton Community Council (0243)

It is indicated that the Plan should provide additional information and surety that the additional capacity proposed will be delivered at early stage relative to the contributing housing development. Clarity must be provided on the proportionality of the solution relative to the impact from development.

**EWE12 - West: Additional secondary school capacity (The Royal High)**

The Davidson's Mains and Silverknowes Association (0454)

No modification specified however it is indicated that the proposal should be clarified to confirm if the two 'places' specified for this proposal description in Table 11 is correct. If it is not correct then it should be updated accordingly.

**EWE13 - West : Additional RC primary school capacity (St. Andrews)**

Genna Spears (0081)

No specific wording is provided but it is indicated that a greater level of additional capacity needs to be provided than is proposed by providing greater extensions and/or additional schools. If this is not done then housing proposals in the catchment should be removed from the plan.

Cramond & Barnton Community Council (0243)



It is indicated that the Plan should provide additional information and surety that the additional capacity proposed will be delivered at early stage relative to the contributing housing development.

### **Extension to Newcraighall Primary School**

Newcraighall LLP (0466)

Amend notation from Map 32 to remove reference to 'School grounds extension at Newcraighall'.

Newcraighall Heritage and Residents Association (0759)

Para 33.8 refers to Newcraighall Primary School and extending the playground. If this school closes this space should be protected as open space so that it cannot be built on.

Para 33.8.1c refers to the new housing area having a road link to Newcraighall but this should make clear that the road junctions at the A1 and around Fort Kinnaird will also need upgrading to cope with the increase in use

### **ECB4: Additional Secondary Capacity at Craigroyston High School and Broughton High School**

Police Scotland / Scottish Police Authority (0659)

It is indicated that this proposal should be removed from the Plan as it is presently described.

Iain R N Stewart (0131)

It is indicated that further details should be provided on this proposal.

### **ED3/ECB1: Annexe at Crewe Road South to Flora Stevenson Primary School to provide additional primary and nursery places**

Police Scotland / Scottish Police Authority (0659)

This proposal should be removed from the Proposed Plan.

Padraic Kinsella (0298)

This site should be used as a location for Gaelic Medium Education (GME) in line with the proposed raised by the Education, Children and Families committee.

### **ERC1: 2 Classes to be provided at Holy Cross Primary School**

Police Scotland / Scottish Police Authority (0659)

It is indicated that this proposal should be removed from the Plan.

### **ERC8: Additional Secondary Capacity at St Thomas of Aquin's High School**

Police Scotland / Scottish Police Authority (0659)

It is indicated that this proposal should be removed from the Plan.

### **Co-Location of Community Facilities and Schools**

Frances Guy (0589)

It is indicated that there should be a clear statement that schools shall include community facilities such as sports facilities.

### **FINANCIAL CONTRIBUTIONS**

Stirling Developments Limited (0303), Ryden LLP (0578)

No modification specified but it is indicated that the Plan should provide clarity on how contributions will be calculated and that this will clearly and transparently inform stated and specific levels of contributions for Education infrastructure.

### **VARIOUS EDUCATION PROPOSALS AND EDUCATION APPRAISAL**

Wright PDL (0078), Defence Infrastructure Organisation (0124), Steven Loomes (0767), Homes for Scotland (0404)

It is indicated that all proposals are objected to as it stands and that the EA should be updated with all relevant information provided and that re-consultation should take place after this. The Plan should not proceed until this has occurred.

The Davidson's Mains and Silverknowes Association (0454)

It is indicated that the former Clydesdale / Cleland garage site should be included in appraisal and update mitigation as required in the appraisal and City Plan.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660), Barratt David Wilson Homes (0677)

It is indicated that all proposals set out in Table 11 of the Proposed LDP should be reviewed based on a corrected, reliable and robust Education Appraisal. The updated EA and proposals accompanied by more specific details that make clear the implications for development in the Proposed Plan. The Proposed Plan and EA should then be reconsulted upon to allow due scrutiny of this information.

Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660)

The EA should also identify that all new schools, not just new school buildings for existing schools will require appropriate school consultation, catchment area adjustments and revised secondary school arrangements.

It is indicated that the Proposed Plan should state that there should be discussion regarding school consultations required and how this links in with residential planning/master planning/budget provision, school design and procurement. Additionally, it should be made clear developers and land owners should have a role in the design and procurement of school/accommodation schools being funded by them and there should be early discussion on mechanisms for tracking school population growth so that it ties in with the efficient provision of new school accommodation. This should also involve community representation.

#### **Summary of responses (including reasons) by planning authority:**

##### **New High School, Primary School and Nursery as part of new development east of Kirkliston, New Primary School at Hatton Village**

BDW Trading/Taylor Wimpey (0199), Miller Homes Limited and Wheatlands Farming Partnership (0592), Sir Jack Stewart-Clark (0800), Inverdunning (Hatton Mains) Ltd (0427)

The education appraisal CD015 assesses the impact of sites identified as suitable for housing development in the proposed City Plan. It does not assess the infrastructure required to support other developments that have been promoted by others as suitable for housing development. If such sites were allocated as suitable for housing development then an assessment of their impact on the learning estate will be required.

The education authority is consulting the school communities aligned to Queensferry High School to develop a learning estate strategy for West Edinburgh that will inform any future statutory consultation process. Through this process it will be determined whether Queensferry High School is permanently extended to accommodate pupils from the new primary school in HSG 32: Builyeon Road and pupils from Kirkliston or if it will be temporarily extended to accommodate pupils until a new high school, either in Kirkliston or West Edinburgh, is delivered. **No modification proposed.**

##### **Education mitigation and/or new school provision associated with development at Riccarton Village**

Miller Homes (0256)

The education appraisal CD015 assesses the impact of sites identified as suitable for housing development in the proposed City Plan. It does not assess the infrastructure required to support other developments that have been promoted by others as suitable for housing development. If such sites were allocated as suitable for housing development then an assessment of their impact on the learning estate will be required. **No modification proposed.**

##### **Currie Community High School**

Archie Clark 0003

The project to replace Currie High School is part of the Council's Wave 4 Investment Programme. Currie High School is being replaced because the structure is approaching the end of its lifespan resulting in a requirement to replace the school. Funding is secured

through the Council's Sustainable Capital Budget Strategy which is reported to the Finance and Recourses Committee each February.

The proposed LDP does not propose further housing growth in Currie High School's catchment area and school roll projections show there is spare capacity in the school. Therefore because the requirement to replace Currie High School is not directly related to pupil generation from housing developments it is not identified in the proposed LDP. **No modification proposed.**

### **General City-wide proposals**

Lynn Grattage (0362), Archie Clark (0003)

The Council is committed to the delivery of a high-quality education for all children and young people. Edinburgh Learns for Life CD0079 is a strategic plan for education designed to meet the objectives of the City Vision 2050 CD076 and is reported to the Education, Children and Families Committee. It was recently updated in response to the recommendations of the Poverty Commission report CD137.

Mixed communities creating genuinely mixed catchment areas is identified in the Poverty Commission report as a key factor to addressing the poverty related attainment gap and inequality across the city. Policies directing developments to create mixed communities will assist in establishing socially diverse catchment areas. **No modification proposed.**

### **Co-location and Community Access**

Frances Guy (0589), Crosswind Developments Limited (0184)

All new schools will be designed for community access in line with policy Inf 1: Access to Community Facilities. Extensions to existing schools will explore improving community access. **No modification proposed.**

### **Capacity and size of schools (extensions to existing and new schools)**

**ESW2 – Dean Park Primary School, EWE10 – Craigmount Secondary School, Additional RC primary school capacity (St. Joseph's RC Primary School), Additional RC secondary school capacity (St. Augustine's RC High School), EWE 13 - West : Additional RC primary school capacity (St. Andrews), EWE7 - West : Additional primary school capacity (Gylemuir)**

Archie Clarke (0003), Genna Spears (0081), Mrs Patricia Scott (0349),  
Cramond & Barnton Community Council (0243)

The Education Appraisal CD015 identifies a baseline peak roll for each primary and secondary school that shows the forecast peak if there were no further housing developments. Estimated pupil generation from housing sites is then added to the baseline peak roll to establish whether the school has capacity to accommodate the cumulative number of pupils expected to be generated to ascertain whether action is required. Actions will be delivered through engagement with affected communities. This engagement process will explore, where appropriate, providing additional accommodation at the affected school(s), catchment changes and new schools. Once agreed and if

necessary, a separate statutory consultation process will be undertaken to change a school catchment area or establish a new school or stage of education. This statutory process will take approximately six months. Where a new school is required, an agreed site will need to be identified before a statutory consultation can proceed.

The Council does not have a maximum size for primary or secondary schools. **No modification proposed.**

## Education Proposals

### **FH2/ED7 Firrhill High School Annexe at Redford Barracks** Archie Clark (0003), Defence Infrastructure Organisation (0124)

The education appraisal shows that Firrhill High School's capacity is regularly breached and that forecast growth, of up to 101 pupils, is attributed to general population growth in its catchment area. Accordingly, pupil generation from new housing developments that are expected to add a further 85 places will exacerbate an existing problem.

The education appraisal explains Firrhill High School cannot be extended on its existing site because of the limits of the site in terms of its topography and size. The capacity of the existing accommodation's social spaces, i.e., dining and assembly space cannot be increased. There are no suitable Council owned sites in close proximity to Firrhill High School to provide annexe accommodation, therefore, in order to support housing growth in its catchment area, a site for an annexe is required. A site of 2.3 ha is required to meet the area requirements of a school with a roll between 1,200-1,400.

The education appraisal CD015 acknowledges alternative options will be considered, including catchment change, however that is a separate statutory consultation process that cannot be prejudged by assumptions in a proposed local development plan. Accordingly, it is necessary to safeguard a site to enable Firrhill High School to extend.

The Council seeks contributions towards providing additional 85 places that are expected to be generated from housing growth in its catchment area, this is subject to change depending on the housing output and mix that comes forward from the Redford Barracks site. The Council will be responsible for its share of additional accommodation required from population growth, including land costs.

The Education Appraisal sets out forecast growth in Firrhill's catchment area as follows:

Table 1: Estimated secondary school pupil generation from existing catchment areas

	Firrhill
Capacity	1,150
Baseline Peak Roll	1,251
Pupil Generation LDP 2016	8
Pupil Generation City Plan	77
Total ND SS	1,336

Proportionately the Council and developers will be responsible for the following costs to deliver additional secondary school capacity. Appendix 3 from the Education Appraisal

CD015 sets a per pupil cost for additional secondary school capacity at £52,609 per pupil (Q2, 2021), excluding land costs and servicing and remediation costs. The Education Appraisal set out costs from housing developments but did not state the Council's contribution. However, table 2 demonstrates the costs in the Education Appraisal relate solely to housing developments and does not attribute costs the Council is responsible for as costs to be incurred by developers.

Table 2: Proportionate costs of additional secondary capacity (Firrhill Contribution Zone)

	Places	£
Population growth (CEC)	101	£5,313,509
Pupil Generation LDP 2016	8	£420,872
Pupil Generation City Plan	77	£4,050,893
Total		£9,785,274
Total CEC		£5,313,509
Total – developers		£4,471,765

**No modification proposed.**

### **FH1 and FH3: Firhill – additional ELC and Primary School Capacity**

#### Defence Infrastructure Organisation (0124)

The Education Appraisal explains that Colinton Primary School (7-classes, 210 capacity) and its nursery class (20 places) do not have capacity to accommodate the estimated 116 ND PS pupils and 43 ELC places that would be estimated to come forward from the development of the Redford Barrack's site based on housing output assumptions of 800 units.

The projected peak roll including pupil generation from the Redford Barrack's site is estimated to be 297. A 12-class primary school with two GP classes is required to support that roll. Colinton Primary School's gym (137 sqm) and dining area (106 sqm) are both also used as circulation space and cannot accommodate further pupils, accordingly any extension to the school will also have to provide adequate core facilities.

The primary school site is 3.8 ha and can accommodate additional classes and ELC places on its site. However, the Education Appraisal notes a new primary school may be more appropriate if the housing output on the Redford Barrack's exceeds the assumptions in the Education Appraisal. This will be reviewed when a planning application is submitted. **No modification proposed.**

### **ESW5 – Location unknown**

#### Archie Clark 0003

The requirement for additional ELC places to mitigate development affects a number of ELC settings: Canal View, Clovenstone and Sighthill Primary Schools and Hailesland and Sighthill Early Learning Centres. The Council will engage with each setting and their

communities to determine where the additional places should be located. **No modification proposed.**

**ED3/ECB1: Annexe at Crewe Road South to Flora Stevenson Primary School to provide additional primary and nursery places**

**New Flora Stevenson Primary School at Royal Victoria Hospital Site**

Helen MacLeod (0364), Police Scotland / Scottish Police Authority (0659), Sheila Strathdee (0448), Iain R N Stewart (0131), Jacqueline Christie (0023), Howard Jones (0424), Ian McRae (0028), Helen MacLeod (0364), Suzie Ross (0440).

The projected peak roll, including pupil generation from known housing developments, is estimated to be 719 pupils, c 102 pupils across each stage. A 25-class primary school is required to support that roll.

The existing school has 21 classes and a 60 place nursery on a site with an area of 0.79 ha. The existing school, built in the Victorian period, does not meet the current site requirements of the School Premises (General Requirements and Standards) (Scotland) Regulations 1967 CD109 which require a site area of 1.2 ha and 0.6 ha for playing fields for a 21 class school and 0.23 ha for a 60 place nursery. The Education Appraisal CD015 states the school cannot be extended to provide additional classrooms to support the forecast pupils expected to be generated from new housing developments. Extending the school would limit the amount of outdoor space for the existing pupils. It is noted other representations, Helen MacLeod (0364) and Suzie Ross (0440), have raised concerns about the capacity and outdoor space at Flora Stevenson Primary School.

While it is acknowledged the school site at Flora Stevenson Primary School does not meet current site requirements and the design of new schools do not adopt the design principles of Victorian schools, there are no plans to replace the school. It is recognised that several schools across the Council's learning estate are in a similar situation. Such a proposal would require extensive engagement with the school community and a budget secured through the Council's Capital Programme, unless a new school can be wholly funded by developer contributions.

Accordingly, a suitable site to provide annexe accommodation located near the existing school site is required to mitigate the forecast pupil growth from new housing developments.

Four additional classes could accommodate up to 120 children. The School Premises Regulations CD109 requires 0.4 ha for school buildings for a primary school with a roll between 61-140 pupils and 0.2 ha for playing fields.

Additional 61 ELC places are also expected to be generated from new housing developments. In line with child/adult ratios, 64 ELC places are required. A 64 place ELC setting requires 0.185 ha for a building and 0.06 ha for outdoor space, a total site requirement of 0.245 ha.

Accordingly, a site with a minimum area of 0.845 ha is required to provide the additional education infrastructure necessary to support the cumulative impact of housing growth in Flora Stevenson's catchment area. Failure to secure the site area required by the

regulations will require an exemption from the Scottish Government which must be in place prior to the transfer of the land to the Council who must first agree to the reduced site. Assuming agreement, Ministerial consent would be sought by the Council by way of a letter outlining the rationale for the exemption. New housing developments cannot be supported without a site to deliver an annexe to provide additional accommodation at Flora Stevenson Primary School.

The alternatives proposed by the respondent include co-location at Broughton High School or with a new Gaelic High School at Victoria Hospital.

The Broughton High School site is 6.8 ha and the education appraisal identifies that additional accommodation is required to meet forecast growth in its catchment area. A site area of 6.8-7.4 ha is required for a roll between 1,400-1,600. Providing annexe accommodation on Broughton High School would compromise any extension required to support additional secondary school places generated from housing developments in its catchment area.

The proposed City Plan identifies the Royal Victoria Hospital site, located in Flora Stevenson Primary School and Broughton High School's catchment areas, as suitable for housing development. A report to Education, Children and Families Committee in September 2022 reported that the Crewe Road Site (Fettes Police Station) and Royal Victoria are not available for the school. The Committee agreed that Council officers will continue to explore options for GME secondary school provision with the GME community.  
**No modification proposed.**

Padraic Kinsella (0298)

With regard to the Crewe Road Site and the GME High School, a report to Education, Children and Families Committee in September 2022 reported that the Crewe Road Site (Fettes Police Station) and Royal Victoria are not available for the school. The Committee agreed that Council officers will continue to explore options for GME secondary school provision with the GME community. **No modification proposed.**

### **ERC1: 2 Classes to be provided at Holy Cross Primary School**

Police Scotland / Scottish Police Authority (0659)

Response to projection methodology covered separately.

Holy Cross RC Primary School shares catchment boundaries with St David's RC Primary School, St Mary's (Edinburgh) RC Primary School and St Mary's (Leith) RC Primary School. The Education Appraisal identifies a requirement to create additional capacity at St David's RC Primary School and St Mary's (Leith) RC Primary School but identifies there is spare capacity at St Mary's (Edinburgh) RC Primary School.

With regard to additional capacity at denominational schools, the Education Appraisal CD015 acknowledges prioritising baptised RC pupils to reduce accommodation pressure at denominational schools is an option but notes it will increase rolls and accommodation pressure at nearby non-denominational primary schools. Catchment change is an alternative option to creating additional capacity but that is a separate statutory consultation process that affects existing school communities and, in the view of the



Education Authority, cannot be prejudiced by proposed housing developments. **No modification proposed.**

#### **ECB4: Additional Secondary Capacity at Craigroyston High School and Broughton High School**

Police Scotland / Scottish Police Authority (0659), Iain R N Stewart (0131)

The Education Appraisal sets out forecast growth in Broughton and Craigroyston's catchment area as follows:

Table 3: Estimated secondary school pupil generation from existing catchment areas

	Broughton HS	Craigroyston HS
Capacity	1,200	600
Baseline Peak Roll	1,231	788
Pupil Generation LDP 2016	187	141
Pupil Generation City Plan	103	13
Total ND SS	1,521	942

Table 3 demonstrates each high school's baseline peak roll exceeds the school's capacity and therefore there is no spare capacity at either school to accommodate additional pupils from housing developments. The Council will be responsible for growth that is not attributed to housing developments.

Appendix 3 from the Education Appraisal CD015 sets a per pupil cost for additional secondary school capacity at £52,609 per pupil (Q2, 2021), excluding land costs and servicing and remediation costs. Proportionately the Council and developers will be responsible for the costs to deliver additional secondary school capacity. The Education Appraisal set out costs attributable to housing developments but did not state the Council's contribution Table 4 demonstrates that the costs in the Education Appraisal relate solely to housing developments and does not attribute costs the Council is responsible for to developers. **No modification proposed.**

Table 4: Proportionate costs of additional secondary capacity (Craigroyston / Broughton Contribution Zone)

Broughton High School	Places	£
Population growth (CEC)	31	£1,630,879
Pupil Generation LDP 2016	187	£9,837,883
Pupil Generation City Plan	103	£5,418,727
Total		£16,887,489
Total CEC		£1,630,879
Total – developers		£15,256,610

#### **ERC8: Additional Secondary Capacity at St Thomas of Aquin's High School**

Police Scotland / Scottish Police Authority (0659)

Despite regularly prioritising baptised Roman Catholic pupils, the roll at St Thomas of Aquin's High School has not been below 700 pupils since 2003 and it has operated over its 750 pupil capacity since 2009. Accordingly, while the projections may show a falling roll by 2030, this should be treated with caution and it is considered that the addition of a further 101 pupils generated by new development will result in accommodation pressures for a school that regularly exceeds its capacity from its existing catchment population alone. **No modification proposed**

#### **ECB5: Additional Primary Capacity at St David's Primary School (1 Class)**

Police Scotland / Scottish Police Authority (0659)

St David's RC Primary School is aligned to St Augustine's RC High School and its catchment area covers Broughton, Craigroyston and The Royal High Secondary Schools' catchment areas. New housing developments in St David's RC Primary School's catchment area are also in Broughton and Craigroyston High Schools' catchment areas, therefore pupil generation from those housing developments have only been applied to the Craigroyston/Broughton Contribution Zone.

The denominational schools assessed in section 12 of the Education Appraisal CD015 affect multiple contribution zones and the proportion attributed to each zone is set out in the assessment. **No modification proposed.**

#### **ED5/DLT2 – Bonnington / Jane Street Primary School**

APS Group (Scotland) Ltd (0518)

The Education Appraisal CD015 states that significant housing development is planned in the Bonnington area that has cross boundary impacts affecting three primary schools each aligned to different secondary schools; Broughton Primary School (Drummond High School), Leith Primary School (Leith Academy) and Trinity Primary School (Trinity Academy).

To accommodate the forecast pupils expected to be generated from new housing developments in each primary school's catchment area the schools would have to be capable of extending to the size shown in table 5.

Table 5: Proposed Capacity of Broughton, Leith and Trinity Primary Schools

School	Class Organisation	GP Requirements	Total Classes
Broughton	23	4	27
Leith	30	5	35
Trinity	23	4	27

In the Education Authority's opinion, Broughton, Leith and Trinity Primary Schools cannot be extended to the size required to support all housing developments proposed in their catchment areas. Accordingly, a new primary school and a site for a new primary school near the proposed housing developments will be required in order to provide the infrastructure necessary to support housing developments. The number of pupils expected to be generated in the Bonnington area is the equivalent of a 14 Class Primary

School with a capacity of up to 420 pupils. The School Premises (Scotland) Regulations (1967, amended in 1973) CD109 requires a site area of 1.2 ha for a 14-class primary school.

The proposed school site has been selected because it is centrally located and has regard to existing site constraints and other proposed development principles in Place 8 – Jane Street that developments in the Bonnington Cluster will be expected to meet. **No modification proposed.**

Padraic Kinsella (0298)

The Education Appraisal CD015 notes that *“The Council also provides education infrastructure for Gaelic Medium Education and for pupils with additional support needs at a city level – i.e. the catchment areas for these schools cover the whole city. Contributions are not sought for these city-wide provisions primarily because the limited size of the cohort makes it difficult to demonstrate that it is reasonable to seek a contribution. This is not only due to the geography (i.e. it is difficult to justify in planning terms that a development in the east of the city should contribute to infrastructure provision in the west of the city) but also the low numbers make projecting demand difficult.”* **No modification proposed.**

#### **ED6/DLT4 – Waterfront Primary School**

Forth Ports Limited (0496)

An indicative site for a new primary school is identified in the Edinburgh Waterfront area to mitigate accommodation pressure at Leith Primary School.

The Housing Land Audit CD056 identifies site LDP EW 1B: Central Leith Waterfront and LDP EW 1C: Leith Waterfront – Salamander Place as a constrained sites in multiple ownership. However, applications for new housing developments in EW 1B and EW 1C have been granted planning permission (HLA refs: 6040, 4893B, 5993, 6011, 4894.1C, 4894.1D, 4894.1E) others are to be determined at Salamander Street / Bath Road (ref: 21/01663/PPP) and Salamander Street / Salamander Yards (ref: 22/03430/FUL) and pre-application discussions are ongoing at others (Baltic Street / Constitution Street and Edinburgh Dock).

The Education Appraisal CD015 assesses the impact of the constrained sites coming forward because there is evidence of development activity in EW 1B and EW 1C.

The Education Appraisal CD015 assesses the impact of cumulative housing developments in Leith Primary School’s catchment area, assuming a new primary school in the Bonnington area can be delivered when it is required thereby removing some housing sites, and the pupils expected to be generated from them, from Leith Primary School’s estimated peak roll. It found Leith Primary School cannot accommodate the estimated number of pupils expected to be generated from housing developments in its catchment area, when the Bonnington housing proposals were excluded. To accommodate an estimated peak roll of 771 ND PS pupils a 26-class primary school with four general purpose classes would be required. In the Education Authority’s opinion, Leith Primary School cannot be extended to the size required to support all housing developments proposed in its catchment area. Accordingly, a new school and a site for a new primary school is required.

A new 12 class primary school is required to support a roll of 295 primary pupils. The Education Appraisal CD015 acknowledges the catchment area for a new Bonnington Primary School will capture some of Leith Primary School's existing catchment population that may reduce the overall size of a new primary school at Leith Waterfront. It is also acknowledged that there is spare capacity at a neighbouring school, Hermitage Park Primary School, that could also be used to reduce the size of a new primary school or potentially the requirement for a new primary school at Leith Waterfront. However, the delivery of the new primary school at Bonnington is not secure and is outwith the control of the developers of EW 1B and EW 1C. Furthermore, a catchment change is a separate statutory consultation process that affects existing school communities and, in the view of the Education Authority, cannot be prejudiced by proposed housing developments. Accordingly, while there may be alternatives to a new primary school at Leith Waterfront they are dependent on the delivery of other infrastructure elsewhere and a separate statutory process that cannot be undermined by assumptions that suit housing developers.

It is recognised the operational port is not a suitable location for a new primary school and the proposed school site is indicative only. However, to support the cumulative effect of further housing developments in EW 1B and EW 1C a safeguarded site for a new primary school is required. **No modification proposed.**

**EWE4 - West: Additional Primary School Capacity Turnhouse Road (SAICA)  
Place 16 West Edinburgh Secondary School mitigation**

**EWE5 – West: Additional Primary School Capacity  
Place 16 West Edinburgh Secondary School mitigation**

West Craigs Limited (0472), Edinburgh Airport Limited (0761), Crosswind Developments Limited (0184), Ryden LLP (0578), SAICA (0590)

These sites are currently aligned to Corstorphine Primary School which was extended to 21 classes (630 capacity) in 2017, along with a new 50 place ELC setting. The school site is 0.63 ha and cannot be extended further.

The new primary school located in LDP (2016) CD039 HSG 19: Maybury was designed to serve and is wholly required to accommodate pupils expected to be generated from HSG 19: Maybury and HSG 20: Cammo. Using latest pupil generation rates set out in the education appraisal and data from the housing land audit, cumulatively the sites are expected to generate 650 ND PS pupils.

Table 6: ND PS at HSG 19 and HSG 20

Housing site	Dwellings	ND PS
HSG 19: Maybury	1,780	517
HSG 20: Cammo	656	133
<b>Total</b>	<b>2,436</b>	<b>650</b>

The working capacity of a 21-class primary school is 630 pupils. The new school has been designed to provide a range of collaborative, flexible, learning and teaching spaces. If a peak of 650 is reached, then some of the 21 classes may require two teachers, known

as team teaching, in line with pupil/teacher ratios. The proposed learning and teaching spaces, including the outdoor space, has been designed to complement team teaching.

The proposed SAICA site is forecast to generate 141 ND PS and the adjacent site at Turnhouse Road is expected to generate 37 ND PS based on the housing capacity and mix assumptions provided by Planning, which are a medium-high density of 100-175 dwellings per hectare and a housing mix of 12% houses and 88% flats. The new primary school in HSG 19: Maybury cannot be extended without compromising the learning and teaching environment that has been designed. Accordingly, the estimated primary pupils expected to be forecast from the Turnhouse sites cannot be accommodated in Corstorphine Primary School or the new primary school in HSG 19: Maybury.

The Education Appraisal CD015 identifies the east coast railway line, Edinburgh Gateway Station and the tram depot as significant barriers to the other housing proposals in West Edinburgh. In the absence of a West Edinburgh master plan and phasing plan that details how and when West Edinburgh will be developed, including cross boundary links between sites H59, H60, H61, H62, H63 demonstrating a new primary school will be accessible using an attractive walking or cycling route and delivered in time to accommodate primary pupils from H59 and H60, it is necessary to safeguard a site for a primary school at Turnhouse. The airport itself does not prevent this safe and pleasant access being possible.

The Council is satisfied adequate consultation has taken place to date, with responses received from key stakeholders including the Airport on this Proposed Plan itself.

The Education Appraisal CD015 has not been based on the specific unit composition in planning application (ref. 20/03210). The Council refused this planning application and this is currently at appeal (ref. PPA-230-2333). City Plan has a different expectation of unit composition that should be delivered on this site and this is what the Education Appraisal is based on. The education appraisal does not specifically require a primary school on the Crosswinds site. Three ND primary schools and one RC primary school are required to serve the cumulative estimated pupil generation from developments at IBG, Crosswinds, Land adjacent to Edinburgh Gateway and Edinburgh 205. The education appraisal explains the location of new schools and their catchment areas will be determined in line with emerging masterplans and phasing plans of the area. **No modification proposed.**

#### Spare capacity at other West Edinburgh Primary Schools

It is acknowledged that other primary schools in the West Edinburgh Zone have spare capacity, but they are not located in a position to serve the proposed developments. Any catchment change will affect the existing population and will likely mean that existing residents will be expected to travel further to reach their new catchment school, for example both Blackhall Primary School and Roseburn Primary school are separated from existing settlements by Corstorphine Hill. In addition, catchment changes at Carrick Knowe, Clermiston, Blackhall primary schools will also affect high school catchment areas because they are not currently aligned to Craigmount High School. Catchment change is a separate statutory consultation process that, in the view of the Education Authority, cannot be prejudiced by proposed housing developments.

It is acknowledged that H62 'Land adjacent to Edinburgh Gateway' is located close to the new primary school in HSG 19: Maybury. However, as explained above, there is no spare

capacity at that school or the existing catchment school, Corstorphine Primary School. H62 is expected to generate 66 ND PS based on the housing mix and capacity assumptions provided by Planning. It is adjacent to other West Edinburgh Sites that cumulatively are expected to generate 1,692 ND PS pupils, the equivalent to two 21-class primary schools and one 15-class primary school which collectively would have capacity for 1,694 pupils.

The education authority is consulting the school communities aligned to Craigmount High School to develop a learning estate strategy for West Edinburgh that will inform any future statutory consultation process. Through this process it will be determined whether Craigmount High School is permanently extended to accommodate pupils from the new primary school in HSG 19: Maybury or if it will temporarily extended to accommodate pupils until a new high school in West Edinburgh, is delivered. The capacity of Craigmount High School would be extended to 1,800 to accommodate pupils from the new primary school in HSG 19. The education authority does not consider the school could be extended beyond 1,800. Accordingly, any new non-denominational primary school in West Edinburgh will be aligned to a new West Edinburgh High School and housing proposals in West Edinburgh will need to demonstrate the necessary infrastructure will be delivered when it is required. **No modification proposed.**

#### **EWE12 - West: Additional secondary school capacity (The Royal High)**

The Davidson's Mains and Silverknowes Association (0454), Police Scotland / Scottish Police Authority (0659)

The Education Appraisal CD015 identifies the Royal High Secondary School's roll is projected to exceed its notional capacity by 268 ND SS pupils, of which, housing developments in the Royal High Secondary School's catchment area are forecast to generate two additional ND SS pupils.

Appendix 3 of the Education Appraisal CD015 sets a per pupil cost for additional secondary school capacity at £52,609 per pupil (Q2, 2021), excluding land costs and servicing and remediation costs. Accordingly, developments in the Royal High Secondary School's catchment area are expected to contribute towards the costs of providing two additional places at the Royal High Secondary School, the Council will be responsible for the remainder of the costs. **No modification proposed.**

#### **LG5 and ELG 6 –Gracemount HS and Liberton HS: Additional Secondary school capacity, New High School at Frogston Road**

Bo Adams (0363), Robyn Kane (0091)

The Education Appraisal CD015 finds there is spare capacity at Gracemount and Liberton High Schools to accommodate some of the additional pupils that would be generated from new housing developments in their catchment areas but both schools will need to be extended to accommodate the forecast growth.

Frogston Primary School is aligned to Gracemount High School and the education appraisal identifies an extension to Gracemount High School is required as opposed to a new high school. It is noted the undeveloped land along Frogston Road is designated as

green belt therefore a new high school would not comply with City Plan policy Env 18: Development in the Green Belt and Countryside.

**No modification proposed.**

### **Extension to Newcraighall Primary School**

#### Newcraighall LLP (0466)

On the 12 March 2020, the Council approved the relocation of Newcraighall Primary School to the new primary school site located in HSG 29: Brunstane.

Given that the Council's intentions are not the only factor that determines if/when the new primary school shall proceed and be able to fully remove the need for the current school then the Council considers the existing safeguard should be retained. **No modification proposed.**

#### Newcraighall Heritage and Residents Association (0759)

The site does not need to be designated as open space in order for it to be treated as open space in terms of policy Env 23 'Protection of Open Space'. This is set out in paragraph 3.138. **No modification proposed.**

### **Additional denominational primary and secondary capacity**

#### Police Scotland / Scottish Police Authority (0659)

The Education Appraisal CD015 explains that denominational schools have cross boundary impacts that can affect more than one contribution zone. The citywide Roman Catholic/non-denominational split shows an approximate 13% value for RC at both primary and secondary levels, this value has been applied to the ND/RC pupil generation ratios for housing developments. **No modification proposed.**

### **Existing Capacity of the Learning Estate**

#### CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), West Town Edinburgh Ltd (0660)

Circular 3/2004 'Guidance on Determining School Capacities' CD121 states it is for education authorities to determine school capacities and the Scottish Government's Guidance on Determining Primary School Capacity (October 2014) CD124 continues to recognise that "it remains a Local Authority responsibility to choose how they calculate capacity in their areas".

Representations claiming the Council does not 'adopt' the Scottish Government's Guidance on Determining Primary School Capacity (October 2014) CD124 are mistaken.

The capacity of the learning estate is informed by the Circulars and Guidance and the education authority's experience on class organisation to ensure there is capacity to accommodate each stage based on P1 and S1 intakes. Maximum class sizes are in line with legislation and teachers' terms and conditions. An example of class organisation based on rolling forward P1 intakes across all stages is outlined in appendix 1: Primary School Class Organisation. CD177

The notional capacity of the secondary school estate takes cognisance of core facilities such as assembly hall and dining areas along with curriculum opportunities.

When assessing whether there is capacity on an existing school site the size of the school site and the requirements of the School Premises (General Requirements and Standards) (Scotland) Regulations 1967 (as amended) CD109 have been considered.

Any future changes to maximum sizes for classes, hours allocated for specific subjects (e.g., physical education) and entitlement to school lunches will affect the overall capacity of a school. **No modification proposed.**

### **Education Appraisal Methodology**

Various Representations: Wright PDL (0078), Defence Infrastructure Organisation (0124), CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660), APS Group (Scotland) Ltd (0518), Miller Homes Limited and Wheatlands Farming Partnership (0592), Barratt David Wilson Homes (0677), Steven Loomes (0767), Homes for Scotland (0404)

### **Pupil Generation Rates (PGR)**

The Council's PGR are based on the actual number of pupils that have been generated from new housing developments across the city. The latest published study covered a 14-year period, identifying the peak year for pupil generation in each sample development to set a city wide average. It indicates the proportion of dwellings that are likely to have primary or secondary school aged children at any one time and not the total number of pupils that will be generated from it. Peak pupil numbers are used to inform the city wide average because the Council needs its learning estate to be capable of accommodating peak cycles.

The Council's PGR are evidenced based and demonstrate a clear relationship between housing developments and the requirement for additional infrastructure to mitigate the cumulative impact of pupil generation from new housing developments. The assessment studied the number of pupils being generated from more than 50 developments across the city representing nearly 4,000 houses and 8,000 flats over a period from 2005 to 2020 and is provided for transparency, appendix 2: Pupil Generation Rates Assessment. CD178

The Council will continue to review the PGR regularly and will review infrastructure requirements accordingly. Respondents stating the Council's PGR are overstated have not provided any evidence or data to demonstrate why it should be lower. The PGR used by other local authorities may not necessarily differentiate between flats and houses and therefore are not a suitable comparison.

The education appraisal identifies spare capacity where it exists when assessing what additional accommodation is required. A cumulative assessment is carried out based on school catchment areas to determine the total number of additional pupils that will be added to a school's catchment population. The education appraisal will inform the actions, costs and contributions that will be set out in Planning Guidance. Per unit rates, based on the cumulative number of dwellings that contribute to the requirement for additional



infrastructure will be set to ensure each dwelling makes a proportionate contribution towards additional accommodation in the learning estate. **No modification proposed.**

### **Consequences of Inaccuracy**

The Council's Capital Investment Programme CD085 includes significant funding for education infrastructure and delivery is often planned in phases to review the requirement for it and provide only what is necessary. It is not in the Council's interest to overstate the requirements for additional education infrastructure that will increase the Council's carbon footprint and budget responsibilities for initially financing and managing and maintaining in the long term.

The Council has one opportunity to secure the funds necessary from developers to deliver education infrastructure, when a planning application or appeal is granted. In contrast, developers can apply to modify agreements they have previously signed up to and will have funds returned to them if they are not spent within the period prescribed in the legal agreement. The Council has no recourse to acquire funds from developers to fund any additional education infrastructure required to accommodate the pupils generated by their developments if what is initially provided is insufficient.

Developers are expected to pay for, or contribute to, additional education infrastructure that would not have otherwise been necessary to ensure the cumulative impact of development can be mitigated. If the amount secured from developers proves insufficient, the Council will be required to meet the funding gap. Having to secure capital funding through the Council's budget setting process for additional education infrastructure which is attributable to housing developments takes resources away from other Council priorities and projects.

For example, Kirkliston experienced substantial housing growth affecting one non-denominational primary school, Kirkliston Primary School. Two housing developments recently affected its catchment population: RWELP HSP 3: CD086 Kirkliston Distillery located to the south of the village and LDP HSG 3: CD039 Queensferry Road located to the north.

To mitigate the impact of new housing developments Kirkliston Primary School was extended from a 14-class primary school (working capacity 420) to a 19-class primary school (working capacity 546). The extension was completed in 2017. The Council received £4.147m in developer contributions for the extension which cost £5.739m to deliver.

Since then, pupil generation from the new developments (which were based on average rather than peak generation) has exceeded estimates and a four-class temporary unit has been delivered at a cost of c. £575k while a permanent solution to its accommodation pressure is developed and delivered.

To permanently address accommodation pressure at Kirkliston Primary School an annexe will be built on one of the playing fields at Kirkliston Leisure Centre to provide additional primary places at an estimated cost of £6m. Accordingly, the total cost of developing primary school provision in Kirkliston to meet demand for places from pupils generated by new development has been £12.314m with developers contributing only £4.147m.

In the absence of an alternative school or Council owned site the annexe will result in the loss of land used as open space and for outdoor sports. The education authority would not want to replicate the loss of open space and/or outdoor sports grounds across the city because of a failure to secure the necessary infrastructure to support pupil generation from new housing developments.

The example in Kirkliston demonstrates the issues the Council must address when insufficient funding for infrastructure is not secured from the outset. **No modification proposed.**

### **Projection Methodology**

As Education Authority, the Council is responsible for ensuring there are sufficient places in schools, including early learning, for all children.

There is no national policy or guidance directing how education authorities assess future demand for early learning and school places. However, the Council liaises with other local authorities on school roll projection methodologies and what applies to one authority does not always apply to another. Pupil generation and school attendance patterns in other authorities will not necessarily be comparable with those in Edinburgh. There will be different variables that need to be considered.

There are inherent matters such as personal circumstances, choices and decisions along with external factors such as geopolitical and global issues that make modelling human behaviour complex; therefore, school roll projections are not an exact science. Accordingly, as is the case with any population or financial market projection, the Council's school roll projections can only provide a guide to future school pressures. They, along with school capacity figures, are an early warning system which are designed to prompt closer investigation of a potential accommodation issue.

School roll projections are updated annually to ensure they are produced based on the best available information. They are informed by the following:

- Catchment population data, including births, P1 intake and S1 intake
- National Records of Scotland (NRS) CDN13918 population projections\*
- Historic patterns of attendance
- Pupil generation from new housing developments using programmed completions from the Housing Land Audit\*\* CD056

\* NRS update their population projections every two years with a two year lag. The 2020 projection was published on 1 March 2022 CD140. The NRS acknowledge their population projections have limitations; they explain "*A projection is a calculation showing what happens if particular assumptions are made. The population projections are trend-based. They are, therefore, not policy-based forecasts of what the government expects to happen. Many social and economic factors influence population change, including policies adopted by both central and local government. The relationships between the various factors are complex and largely unknown. The reliability of projections decreases over time, and projections tend to be less reliable in periods of rapid change... Projections of the number of adults (particularly elderly people) are usually more reliable than those for children because they are based on people who are already living in Scotland.*"

(<https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by->

theme/population/population-projections/uses-and-limitations-of-population-projections).

The proposed City Plan was published for consultation in September 2021. It is not approved policy and therefore the housing growth and subsequent population growth will not inform 2020 NRS population projection.

The NRS 2020 projection was not available for the projection published in the Education Appraisal (September 2021) or the 2021 annual school roll projection (February 2022). The 2018 NRS population projection for the City of Edinburgh Council local authority area was used to inform both projections.

**\*\* Housing proposals in the proposed City Plan will not be added to annual projections until it is adopted or planning permission is granted for specific proposals. Accordingly, annual projected rolls may show capacity in catchment schools however they do not take account of the urban area growth proposed by City Plan.**

The Council acknowledges that, like the limitations of NRS population projections, annual school roll projections are a snapshot from a point in time that cannot take account of changes in trends, such as birth rates, because they simply project forward past trends. School roll projections are also susceptible to future changes in patterns of attendance which may be driven by other external factors, such as public perception of a school or the popularity of neighbouring schools. They cannot take account of changes in the choices people make about attendance of Roman Catholic schools or Gaelic Medium Education. They cannot account for changes in Council or Government education policy or changes in financial circumstances which might, for example, result in changes in the percentages of pupils attending the independent sector.

For this reason, projections, and the PGR on which they are based, may be subject to change, and the further out projections extend, the less reliable they are likely to become. The production of annual roll projections incorporating the latest birth, catchment population and housing data means that, over time, projections should reflect shifting trends but this means they take time to reflect the impact of changes that may take place quite suddenly such as the opening of a new school or a change of catchment.

The education appraisal CD015 explains that Figures 1a and 1b show actual school rolls across the estate based on school census information from 1985-2020 and two sets of projected rolls; (1) showing the annual projection published in March 2021 which includes housing developments in the HLA CD056 (LDP 2016 CD039) and (2) showing the 2020 projection that is appended to the education appraisal where pupil generation from housing developments have been removed. Both projections are created using the same methodology, albeit one includes pupil generation from housing developments, and the other removes pupil generation from housing developments.

Contrary to the assertions from some representations, the Council's projection methodology does take account of children passing through the school system and the phased build out of housing when it is known and included in the Housing Land Audit CD056. What the representations appear not to understand is that, as explained above, the PGR represents the number of pupils that are expected to come forward at any one time and not the total number of pupils that a particular site will generate.

The education appraisal differs from the appraisal that supported the 2016 LDP CD039.

1. The baseline projection, excluding pupil generation from housing developments is included. A peak roll has been used to establish a baseline because, in the education authority's experience, school rolls are cyclical, and the Council needs to ensure its learning estate can respond to the peaks and troughs in population change evidenced in Figures 1a and 1b of the education appraisal.
2. Spare capacity in the existing learning estate is identified and the requirement for additional accommodation takes cognisance of any spare capacity that may exist.

The education appraisal continues to assess the cumulative impact of housing developments in school catchment areas to determine what additional infrastructure is required. School catchment areas are used to establish contribution zones and sub-zones. Accordingly, where additional infrastructure is required it will be directly linked to the school catchment area the proposed site is located in.

Arguments against providing necessary infrastructure to support new housing developments because there is theoretical capacity in the future do not, in the Council's opinion, justify not making a contribution towards additional education infrastructure when it is demonstrated that peak rolls cannot be accommodated without it, particularly when, in the Council's experience, projected rolls are less reliable the further they extend. It is not clear how the representations intend to accommodate peak rolls by solely relying on a theoretical future capacity.

Accordingly, the Council's assessment of the infrastructure needs from housing developments proposed in the City Plan use school roll projections as a guide but are based, most crucially, on its experience as an Education Authority accommodating changing populations. This means considering the long-term impact of a new development on a catchment population that will move in cycles lasting ten years at a time.

The education appraisal CD015, in the view of the education authority, has sufficient information to understand where capacity exists in the existing learning estate, what the peak generation from an existing catchment population may be, how many pupils are expected to be generated from housing developments across the city and what infrastructure is required to support that growth.

The education appraisal CD015 sets out the infrastructure required to support growth across the city using the latest pupil generation rates and best available data from projected rolls and housing output assumptions provided by Planning on the capacity of proposed sites and housing mix. **No modification proposed.**

### **Infrastructure Delivery; detail of proposed actions and alternative options**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), APS Group (Scotland) Ltd (0518), Ryden LLP (0578), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660), Archie Clark (0003), Gemma Spears (0081), Robyn Kane (0091).

### **EWE3, EWE9, EWE10, EWE12**

Cramond & Barnton Community Council (0243)

The education appraisal CD015 sets out where there is spare capacity and where additional ELC, primary or secondary capacity is required to mitigate the impact of forecast pupil generation from new housing developments on the existing learning estate, based on its current catchment areas.

The education authority requires the actions to be flexible to achieve their aim of creating additional capacity in the ELC, primary and secondary estate. This is because, particularly with respect of new schools and any changes to existing catchment areas, a separate statutory consultation with existing school communities is required and the proposed City Plan and its education appraisal should not prejudice that process.

Before a statutory consultation can be carried out for a new school, the new school site has to be known to determine its catchment population to establish the affected communities. The statutory consultation process takes around six months to conclude depending on school holidays and committee cycles. The time to transfer land, design and build a new school (approximately four years) needs to be taken into account when planning the phasing of sites to ensure infrastructure is available when it is required. It is acknowledged the outcome of this separate statutory process may require a revision to the education infrastructure requirement.

When extending existing schools, the education authority consults the affected school community to develop a solution. The precise details of a refurbishment or an extension cannot be finalised without input from a design team and the school community. It would not be reasonable or feasible to appoint design teams and engage with all schools and their communities on how their school could be extended or refurbished to provide additional capacity for pupils estimated to be generated from housing developments that form part of a proposed LDP. The education appraisal provides a high-level assessment of the additional capacity required and the schools affected.

The education authority recognises there may be opportunities to reduce the scope of the actions identified in the education appraisal. However, this is predicated on the delivery of other infrastructure at the appropriate time to ensure capacity is available when it is required.

For example, in West Edinburgh the requirement for a new 7-class primary school could be removed if accessible, safe routes to a new primary school from H59: Land at Turnhouse Road (SAICA) to another West Edinburgh site can be delivered at the appropriate time. However, until a West Edinburgh Master Plan and phasing plan is prepared it cannot be assumed that the necessary infrastructure to support housing development at H59: Land at Turnhouse Road (SAICA) and H60: Turnhouse Road can be delivered at the appropriate time.

Similarly, the requirement for a new primary school at Leith Waterfront could be removed if a new primary school is delivered in the Bonnington area and a catchment change with Hermitage Park Primary School can be delivered at the appropriate time.

The delivery of the infrastructure required will be determined when the phasing and programming of new housing developments is known to ensure it is delivered at the appropriate time and will be reviewed annually in line with projected rolls and the Action Programme.

Accordingly, the education appraisal strikes a balance between identifying the infrastructure required to deliver the additional capacity necessary but retaining the flexibility to deliver the infrastructure in consultation with existing communities. **No modification proposed.**

### **Financial Contributions**

Stirling Developments Limited (0303), Ryden LLP (0578)

The Education Appraisal CD015 is an assessment of the infrastructure required to mitigate growth arising from additional pupils from new housing developments. Per unit rates will be set out in non-statutory guidance and reviewed and updated as part of annual reporting of the LDP Action Programme. **No modification proposed.**

### **Action Summary Table and Cost Schedule**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649), Police Scotland / Scottish Police Authority (0659), West Town Edinburgh Ltd (0660), Barratt David Wilson Homes (0677)

The cost schedule in the Education Appraisal CD015 is based on the Council's experience awarding contracts to extend existing primary and secondary schools and to build new primary and secondary schools. The costs reflect the Council commitment to deliver low energy, high quality, Passivhaus buildings. The requirement for all new buildings (including school extensions where possible) to meet Passivhaus standard is set out in the Council's Business Plan CD085.

The costs include provision for fees, furniture, fixtures and fittings but *exclude* any land acquisition costs and/or any site specific costs which would be established once sites have been determined. These costs also *exclude* future cost inflation. Infrastructure contributions will be index linked based on the increase in the BCIS Forecast All-in Tender Price Index. Indexing will not be applied to land costs.

Retaining contingency within a capital project (the budgets for which the cost schedule represents) is standard practise and is necessary to mitigate the impact of unexpected costs. The scale of the contingency applied (5% or 10%) is dependant on the scale of the project.

For transparency, Schedules of Accommodation CD179 for primary schools are provided at Appendix 3.

The floor areas for primary school extensions are all based on standalone extensions. The 4-classroom extension is based on the floor area of the new extension at Sciennes Primary School; the 3-classroom extension and 2-class extensions are based on buildings delivered through the Council's Rising Rolls 3 scheme.

The base cost for an extension of £5,365 sqm comes from the Stage 2 Cost report in March 2021 for the 4-classroom extension at Sciennes Primary School. This project was used as a benchmark for extension costs as the design already includes the required Passivhaus standard and therefore no additional costs are added for quality requirements.

It should be noted that given the significant cost increases experienced across all sectors it is likely that the costs in the education appraisal will increase as part of the next Action Programme to reflect the Council's more recent experience delivering capital projects.

All site areas for new infrastructure are based on statutory requirements set out in the Schools Premises Regulations, 1967 as amended CD109.

The value of the land will be determined by the district valuer and the cost of the land will be shared proportionally between developments that are located the relevant contribution zone or sub-zone. The value of the land will be credited against the site's overall education infrastructure contribution. The costs for servicing and remediating the land will be estimated by a quantity surveyor. However, these costs can only be set out when the land for a new school is known.

The delivery of the education infrastructure will be set out when the phasing of housing developments is known. **No modification proposed.**

#### **Clydesdale / Cleland garage sites**

Not available

The Davidson's Mains and Silverknowes Association (0454)

This site was refused planning permission for residential development (ref: 20/01410/PPP) and it is not identified as an 'other land' housing site in the proposed City Plan or in the latest Housing Land Audit CD056. The education appraisal only assesses sites in the latest Housing Land Audit and in the proposed City Plan. **No modification proposed.**

#### **Reporter's conclusions:**

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#### **Reporter's recommendations:**

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<b>Issue 30</b>	<b>Infrastructure Delivery Transport</b>	
<b>Development plan reference:</b>	Part 3. Pages 125-126, Policy Inf 3.	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <div> Ambassador Group (0683)  Barratt David Wilson Homes (0677)  BDW Trading (0350)  CALA Management Ltd (0465)  CoMoUK (0728)  Crosslane Co-Living SPV 2 Limited (0687)  Crosswind Developments Ltd (0184)  Grange/Prestonfield Community Council (0192)  Hallam Land Management (0599)  Hazledene House Limited (0695)  Homes for Scotland (0404)  HUB Residential (0582)  Katherine Kennedy (0569)  Liberton &amp; District Community Council (0084) </div> <div> Living Streets Edinburgh Group (0486)  Miller Homes Limited (0649)  Newcraighall LLP (0466)  SEPA (0012)  Steve Loomes (0767)  Stewart Milne Homes (0118)  Stirling Developments Limited (0303)  Suzanne McIntosh (0409)  Taylor Wimpey (0200)  Telereal Trillium (0540)  The Davidson's Mains and Silverknowes Association (0454)  Transport Scotland (0480)  University of Edinburgh (0464)  West Town Edinburgh Limited (0660)  Wright PDL (0078) </div> </div>		
<b>Provision of the development plan to which the issue relates:</b>	Policy Inf 3 Infrastructure Delivery and Developer Contributions	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Inf 3. Infrastructure Delivery and developer Contributions.</u></b></p> <p><u>University of Edinburgh (0464)</u></p> <p>Important that a proportionate response is adopted and reflects the significant investment and contribution to the economy that the University activity already makes. Counterproductive to burden University projects unnecessarily with generic contribution requests where this would limit the ability to deliver the best out of proposals and to meet wider University and City Council aims and objectives.</p> <p>Important that this topic is given appropriate focus in the development of the plan content, and thereafter any revised guidance. Clarity of approach is critical to provide certainty on the criteria and application of any requirements, and the University would welcome further involvement and consultation on new Guidance.</p> <p><u>Barratt David Wilson Homes (0677), Homes for Scotland (0404), Wright PDL (0078), Steve Loomes (0767).</u></p>		



To what extent has this been scoped? To allocate the additional sites, and to not allocate others, must have been informed by an evidence-gathering process in this regard. Has this Policy been informed by background work?

It will be important to establish the cost of compliance here, and whether viability has been considered. Has the Council considered the impact of cumulative costs? Is there a commitment to closing potential funding gaps (e.g., NHS Lothian)?

Contributions need to be fairly and reasonably related to what is proposed and must be necessary for the development to proceed. It will be important that the Council avoids a situation where the delivery of early phases of large sites are stalled because all the land necessary for such connections is not in the applicant's control.

New development can and should only contribute to what is fairly and reasonably related to the development which is proposed as established in Circular 3/2012 and the Elsie Supreme Court judgement ([2017] UKSC 66). It will be necessary to support a phased approach to provision so requirements do not prevent the delivery of larger sites where early phases in single ownership can be delivered. It will also be essential that those preparing place briefs involve developers, fully understand land ownership and take a pragmatic, delivery focused approach.

It is important that Policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks creates uncertainty and adds complexity and risk to the planning application process.

Information has been requested by HFS to demonstrate the evidence behind the updated pupil per house/flat rates in the Education Appraisal. This information has not been provided by then Council. Without this information, the Education Appraisal is not considered robust, and consultees are not in a position to provide fully informed representations.

Information was also requested by HFS to seek an analysis of the new LDP sites, and impact of allocating these sites on the education estate and the relationship with new education infrastructure mitigation set out in the Education Appraisal. The information provided in response did not allow for a robust analysis to be undertaken. As such, the Education Appraisal is not considered robust, and consultees are not in a position to provide fully informed representations.

#### Homes for Scotland (0404), Steve Loomes (0767)

Home builders and other delivery partners need clarity at the Plan stage on what infrastructure will be expected to be provided through new development. Any developer obligations related to infrastructure requirements must be properly justified having regard to policy. They should be able to be viably delivered.

The Council needs a clear awareness of and strategy for any land assembly work required for the delivery of the desired infrastructure, so it avoids a situation where the delivery of early phases of large sites is stalled because all of the land necessary for a such connections is not in the applicant's or the Council's control. The Council also needs to be aware of the realistic costs and timeframe of this process.

Issues such as education transport and other infrastructure need to be led by expert advice and evidence.

There are concerns that, with regards to education, the Council appears to have adopted the same approach to contributions as the previous guidance, which Ministers rejected.

#### Telereal Trillium (0540)

Change to policy is requested to allow viability-constrained sites to present a site-specific case to prove further evidence on site challenges and viability/implementation by reason of various factors including: threshold land value, profit margins impaired, historic infrastructure and future site clearance requirements.

The additional policy would help to deliver some larger urban brownfield sites and avoid an over-rigorous policy approach which could jeopardise the delivery of these sites. Matters of threshold land value and legacy site costs have to be aired in the planning process, in order to effect the implementation of a brown-field led plan.

#### Stewart Milne Homes (0118), BDW Trading (0350), Taylor Wimpey (0200)

Not enough information has been provided to assess this policy. Important supporting information should be made available for comment and to allow assessment. There is no evidence to demonstrate the Council has considered the cost of compliance.

It is important that Policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks creates uncertainty and adds complexity and risk to the planning application process. New development can and should only contribute to what is fairly and reasonably related to the development which is proposed.

#### HUB Residential (0582), Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazeldene House Limited (0695).

Support in principle, however, the proposed planning guidance and contribution zones and levels should be subject to consultation with the development industry and the methodology should be clear. New development can and should only contribute to what is fairly and reasonably related to the development which is proposed

#### Transport Scotland (0480)

It is a commitment within the Edinburgh and South East Scotland City Region Deal (ESES CRD) to produce a Developer Contributions Framework based on the outputs of the Cross Boundary Study (2017). This commitment is reflected in the draft NPF4. There has not been further progress on this work to date and the Proposed Plan does not provide any further information. Cross boundary impacts have not been appraised or detailed within the Proposed Plan or Transport Appraisal.

The ESES CRD states:

2.52 Partners will put in place a Regional Developer Contributions framework based on the work currently being led by SESplan (the strategic development planning authority for Edinburgh and South-East Scotland) and findings of the Cross-Boundary Study, published

in 2017. These interventions and commitments, taken with the additional transport investment to enable the innovation and housing projects, will help ensure the city region continues to grow and flourish.

Within the Proposed Plan Policy Inf 4 Provision of Transport Infrastructure states; Development proposals relating to housing or other development sites which would generate a significant amount of trips, shall demonstrate through an appropriate transport assessment or statement, and proposed mitigation that:

a. Identified\* local, city-wide and cross boundary individual and cumulative transport impacts can be timeously addressed where this is relevant and necessary for the proposal.

Policy Inf 3 Infrastructure Delivery and Developer Contributions details a “cross-boundary delivery mechanism” and “for strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.” Transport Scotland do not consider it an acceptable position for cross boundary impacts to be assessed by developers when submitting planning applications as detailed within Policy Inf 4 given the commitment made in the ESES CRD as reflected in draft NPF4.

Policy Inf 3 refers to a cross boundary delivery mechanism, however, no detail is provided on what this is and no specific details on funding are provided.

It is recommended that reference to cross boundary impacts is removed from Policy Inf 4 ‘Provision of Transport Infrastructure’ as the planning application stage is not an appropriate time where cross boundary impacts should be identified and appraised. It is not the responsibility of the developer to identify plan wide cumulative cross boundary impacts.

#### Stirling Developments Limited (0303)

Support the principles of the policies in this section albeit, request further detail on how CEC considers this can be delivered. Detail is sought on developer contributions and viability.

#### Suzanne McIntosh (0409)

Council needs to be more specific in the timing of the provision of infrastructure in relation to phased larger developments and retain tight control and enforcement of this. We have not seen that to date, especially in the developments on the south side of the city. Please ensure this is addressed in the plan.

#### Crosswind Developments Ltd (0184)

Object to the requirements of Policy Inf 3.

Not clear that point “e” is aligned with the findings of the Supreme Court in terms of Aberdeen City and Shire Strategic Development Planning Authority v Elsick Development Company Limited. (New development can and should only contribute to what is fairly and reasonably related to the development which is proposed).

#### Living Streets Edinburgh Group (0486)

Support the thrust of the policy, but there is no mention of securing contributions towards pedestrian infrastructure. Any development which generates additional pedestrian movements which did not exist previously has an impact on surrounding

pedestrian infrastructure. This impact can be material.

It is legitimate to require contributions if there is a demonstrable link between development and infrastructure. The alternative is not to allow development in cases where existing pedestrian infrastructure is inadequate.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Ltd (0649)

Planning obligations should meet all five policy tests of Circular 3/2012, which should be reflected in the Proposed LDP Policy Inf 3 Infrastructure Delivery and Developer Contributions.

Circular 3/2012 is clear that planning obligations need to be rooted in the development plan. Given that details of planning obligations are not included in the development plan, they must be included in statutory supplementary guidance which would form part of the development plan once adopted. It would not be appropriate for planning obligations to be set out in non-statutory guidance, which would not form part of the development plan or be subject to the same level of scrutiny.

Details of planning obligations should have been included in the Proposed LDP for consultation, as it is unclear whether the Council will be able to bring forward supplementary guidance before Section 22 of the 1997 Act is repealed and any subsequent transitional period. Particularly given the Council's previous difficulties adopting supplementary guidance, where it was directed by Scottish Ministers not to adopt its Supplementary Guidance on Developer Contributions on a number of occasions.

CoMoUK (0728)

The policy should include developer's contributions to shared transport schemes in the schedule of infrastructure shown. This will ensure and enable shared transport allocations in new developments.

Newcraighall LLP (0466)

It is unclear what is meant where Policy Inf 3 states that, 'Where, by the nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions will be sought.' The nature of the infrastructure should be defined, and if it cannot be delivered by the developer directly, it should be clarified how developer contributions are to be sought. Any developer contributions must be imposed according to the tests set out in the relevant Scottish Government Circular.

The Davidson's Mains and Silverknowes Association. (0454)

The principle that new development will only be supported where it can be demonstrated there is infrastructure capacity to absorb the additional impact of the new development is fully supported but the application of the principle needs to be significantly strengthened.

Developments have been approved where the existing main road infrastructure had already been operating at capacity and yet the proposed mitigations included in the Plan and the associated City Mobility Plan are minimal. The congestion causes serious air

pollution.

Grange/Prestonfield Community Council (0192)

Points out the limited scope of City Plan 2030 to bring about the necessary infrastructure on a city-wide basis. The LDP can only facilitate developer contributions in new development and not the required investment elsewhere.

West Town Edinburgh Limited (0660)

It is assumed that any developer contributions towards PT1 will be proportionately determined considering any public transport infrastructure that may be delivered as part of an individual development proposal. Similar points should be noted in respect of transport proposal PT4 – West Edinburgh A8 public transport corridor.

**Modifications sought by those submitting representations:**

**Inf 3. Infrastructure Delivery and Developer Contributions.**

University of Edinburgh (0464)

No modification specified but it is indicated that it is Important that this topic is given appropriate focus in the development of the plan content, and thereafter any revised guidance. Clarity of approach is critical to provide certainty on the criteria and application of any requirements, and the University would welcome further involvement and consultation on new Guidance.

Barratt David Wilson Homes (0677), Homes for Scotland (0404), Wright PDL (0078), Steve Loomes (0767).

No modification specified but questions are raised to what extent the policy has been scoped? And if it has been informed by background work?

It will be important to establish the cost of compliance here, and whether viability has been considered. Has the Council considered the impact of cumulative costs? Is there a commitment to closing potential funding gaps (e.g., NHS Lothian)?

Contributions need to be fairly and reasonably related to what is proposed and must be necessary for the development to proceed. Those preparing place briefs need to involve developers, fully understand land ownership and take a pragmatic, delivery focused approach being aware of the costs and timeframes.

It is important that Policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks creates uncertainty and adds complexity and risk to the planning application process.

Homes for Scotland (0404), Steve Loomes (0767)

No modifications specified however it is indicated that home builders and other delivery partners need clarity at the Plan stage on what infrastructure will be expected to be provided through new development. Any developer obligations related to infrastructure requirements must be properly justified having regard to policy. They should be able to be viably delivered.

#### Telereal Trillium (0540)

Additional new policy after Inf 3, on the following lines:

Policy Inf 3 applies to all new development sites across the city but in the case of some brownfield sites with a legacy of on-site infrastructure, remediation, costs/revenue constraints, there will be an opportunity for a site viability/delivery report to be presented to evidence restrictive on-site costs, and a case for relaxation of the normal full infrastructure contribution tariff, if this will help to deliver a significant brownfield housing-led redevelopment.

#### Stewart Milne Homes (0118), BDW Trading (0350), Taylor Wimpey (0200)

There is an Asterisk next to the word mitigation, with no corresponding one to explain what this means. This should be clarified.

No other modification specified but it is indicated that not enough information has been provided to assess this policy. Important supporting information should be made available for comment and to allow assessment. There is no evidence to demonstrate the Council has considered the cost of compliance.

#### HUB Residential (0582), Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazeldene House Limited (0695).

No modifications specified however, it is indicated that the proposed planning guidance and contribution zones and levels should be subject to consultation with the development industry and the methodology should be clear.

#### Transport Scotland (0480)

Further information is requested on the references to a cross boundary delivery mechanism within Policy Inf 3 including the progress and timescales of this work, what infrastructure does it include and the funding and methodology for delivering infrastructure. This should be included in the plan. It is also recommended to include reference to 'Development Principles' within Policy Inf 3 Infrastructure Delivery and Developer Contributions, part a, to embed them within the requirements to be provided by developers.

It is recommended that reference to cross boundary impacts is removed from Policy Inf 4 'Provision of Transport Infrastructure' as the planning application stage is not an appropriate time where cross boundary impacts should be identified and appraised. It is not the responsibility of the developer to identify plan wide cumulative cross boundary impacts.

#### Stirling Developments Limited (0303)

No modifications specified but request further detail on how CEC considers Inf 3 can be delivered. Detail is also sought on developer contributions and viability.

#### Suzanne McIntosh (0409)

No modifications specified but it is indicated that the Council needs to be more specific in the timing of the provision of infrastructure in relation to phased larger developments and retain tight control and enforcement of this in the plan.

Crosswind Developments Ltd (0184)

An amendment to the wording of Policy Inf 3 is set out below:

Proposals will be required to deliver or contribute to the following infrastructure provision where relevant and necessary to mitigate\* any significant negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Council's sustainable transport targets (mode share targets) and where commensurate to the scale of the proposed development:

Point (e) Inf 3 should be deleted.

Living Streets Edinburgh Group (0486)

The plan needs to revise how the Council assesses "new infrastructure" i.e. there needs to be assessments to ensure that existing infrastructure meets needs of pedestrians otherwise "new" needs to include upgrading/enhancement. This also has to be co-ordinated with an assessment of what is required across city much of which will not necessarily be picked up by planning proposals. Also, there is a need to assess proposals of all scales and secure proportionate contributions via S75 or upfront payments for a "walking pot".

CALA Management Ltd (0465), Hallam Land Management (0599) Miller Homes Ltd (0649)

Insert at end of policy text:

Developer contributions will require to accord with all of the tests of Circular 3/2012 *Planning Obligations and Good Neighbour Agreements*. Developer contributions required in support of planning applications will have regard to supplementary guidance prepared by the Council but will be considered on a case-by-case basis against all of the tests of Circular 3/2012.

Amend paragraph 3.197 as follows:

Supplementary planning guidance will set out the mechanism for the detailed calculation of proportionate contributions within a contribution zone, as well as any exceptions. It will detail which appraisal identified the impact of development on existing infrastructure capacity and the recommendation of mitigating actions.

CoMoUK (0728)

Propose the wording:

(f) Local scale shared transport infrastructure such as Mobility Hubs that will deliver a shared transport outcome in a development; with reference to Edinburgh City Mobility Plan Policy Movement 16 Shared Transport and Policy Movement 19 Mobility Hubs.

Newcraighall LLP (0466)

The nature of the infrastructure should be defined, and if it cannot be delivered by the developer directly, it should be clarified how developer contributions are to be sought.

The Davidson's Mains and Silverknowes Association (0454).

The principle that new development will only be supported where it can be demonstrated there is infrastructure capacity to absorb the additional impact of the new development needs to be significantly strengthened within the plan.

Grange/Prestonfield Community Council (0192)

Add to para 2.114: "Support for all these strategies is dependent on public investment in a timely and co-ordinated manner to ensure that the developer contributions support and achieve the desired outcome for the city as a whole"

West Town Edinburgh Limited (0660)

No modification specified but it is indicated that it is assumed that any developer contributions towards PT1 will be proportionately determined considering any public transport infrastructure that may be delivered as part of an individual development proposal. Similar points should be noted in respect of transport proposal PT4 – West Edinburgh A8 public transport corridor.

**Summary of responses (including reasons) by planning authority:**

**Inf 3. Infrastructure Delivery and Developer Contributions.**

University of Edinburgh (0464)

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where, relevant and, necessary, to mitigate any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Council's sustainable transport targets and where, commensurate, to the scale of the proposed development.

The Council considers the wording of policy Inf 3 is suitably robust whilst still providing the degree of flexibility that is required when a planning application is being assessed. The importance of the policy is acknowledged. The Council welcomes the offer for further involvement with the University in terms of future guidance. **No modification proposed.**

Barratt David Wilson Homes (0677), Homes for Scotland (0404), Wright PDL (0078), Steve Loomes. (0767)

Part 4, tables 3-10 of the plan sets out the transport proposals to deliver the strategy and policies of the plan. These have been informed by the TA modelling and analysis (CD014), the ESSTS (CD071), CMP (CD062) as well as WETA 2016 Refresh (CD073) and WETIP (CD072).



Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate\* any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Council's sustainable transport targets and where commensurate, to the scale of the proposed development.

The plan clarifies that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place Policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis. Inf 4 requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Where necessary to mitigate cumulative impacts, contribution zones will apply. These will demonstrate the direct relationship between development, either individually or cumulatively and the need for that infrastructure. For strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

Paragraph 3.198 states that it is the Council's preference that infrastructure is directly delivered by developers wherever possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions shall be sought. The details of the actions are also set out and shall be updated in the Plan's action programme. (CD008).

Phasing of development has a dependency on landowner and developer decisions and timings. Therefore, the specifics of timing of infrastructure provision where required are part of planning application considerations. Most will be delivered with development and so will follow the delivery and phasing timescale of development at project level. Where development has a dependency on infrastructure provision that will be part of the project level considerations these will be controlled by conditions on the application. Subsequent action programmes will be updated and will provide more detail on delivery timescales as development proposals come forward and are continually informed by the pace of housing completions as evidenced by the Council's annual housing land audit and completions programme. The Council considers the actions and the Plan's strategy to be delivered within the timeline of the Plan.

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development. All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD119).

The requirement for those preparing place briefs to involve developers and to take a pragmatic, delivery focused approach being aware of the costs and timeframes is acknowledged. The Council's position relative to healthcare contributions can be seen in Issue 27: Infrastructure Delivery and Developer Contributions. The Council's position

relative to education contributions can be found in Issue 29: Infrastructure Delivery-Education. **No modification proposed.**

Homes for Scotland (0404), Steve Loomes (0767)

Part 4, tables 3-10 of the plan sets out the transport proposals to deliver the strategy and policies of the plan. These have been informed by the TA modelling and analysis (CD014), the ESSTS (CD071), CMP (CD062) as well as WETA 2016 Refresh (CD073) and WETIP (CD072).

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate\* any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Councils sustainable transport targets and where, commensurate, to the scale of the proposed development.

The plan clarifies that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place Policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis. Inf 4 requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Where necessary to mitigate cumulative impacts, contribution zones will apply. These will demonstrate the direct relationship between development, either individually or cumulatively and the need for that infrastructure. For strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

Paragraph 3.198 states that it is the Council's preference that infrastructure is directly delivered by developers wherever possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions shall be sought. The details of the actions are also set out and updated in the Plan's action programme (CD008).

Phasing of development has a dependency on landowner and developer decisions and timings. Therefore, the specifics of timing of infrastructure provision where required are part of planning application considerations. Most will be delivered with development and so will follow the delivery and phasing timescale of development at project level. Where development has a dependency on infrastructure provision that will be part of the project level considerations these will be controlled by conditions on the application. Subsequent action programmes will be updated and will provide more detail on delivery timescales as development proposals come forward and are continually informed by the pace of housing completions as evidenced by the Council's annual housing land audit and completions programme (CD055). The Council considers the actions and the Plan's strategy to be delivered within the timeline of the Plan.

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its

appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development.

All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD119).

The requirement for the Council to be aware of the strategy for any land assembly work is acknowledged. The Council's position relative to healthcare contributions can be seen in Issue 27: Infrastructure Delivery and Developer Contributions. The Council's position relative to education contributions can be found in Issue 29: Infrastructure Delivery-Education. **No modification proposed.**

#### Telereal Trillium (0540)

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Council's sustainable transport targets and where commensurate, to the scale of the proposed development.

The plan clarifies that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place Policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis (CD014). The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Where necessary to mitigate cumulative impacts, contribution zones will apply. These will demonstrate the direct relationship between development, either individually or cumulatively and the need for that infrastructure. For strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

Paragraph 3.198 states that it is the Council's preference that infrastructure is directly delivered by developers wherever possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions shall be sought. The details of the actions are also set out and updated in the Plan's action programme (CD008).

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development. All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD119).

The Council considers the wording of policy Inf 3 to be suitably robust whilst still providing the decision maker the required degree of flexibility. **No modification proposed.**

Stewart Milne Homes (0118), BDW Trading (0350), Taylor Wimpey (0200)

The Council acknowledges that there is a technical error in that there is an asterisk in the first sentence on page 126. This will be removed as a minor drafting matter.

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Councils' sustainable transport targets and where, commensurate, to the scale of the proposed development.

The plan clarifies that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place Policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis. The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Where necessary to mitigate cumulative impacts, contribution zones will apply. These will demonstrate the direct relationship between development, either individually or cumulatively and the need for that infrastructure. For strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

Paragraph 3.198 states that it is the Councils preference that infrastructure is directly delivered by developers wherever possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions shall be sought. The details of the actions are also set out and updated in the Plan's action programme (CD008).

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development.

All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD119). **No modification proposed.**

HUB Residential (0582), Ambassador Group (0683), Crosslane Co-Living SPV 2 Limited (0687), Hazeldene House Limited (0695).

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development.

All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD119). The draft guidance will be on the consultation hub for comment for a period no less than six weeks. **No modification proposed.**

#### Transport Scotland (0480)

The Developer Contributions Framework based on the outputs of the Cross Boundary Study (2017) produced by the Edinburgh and South East Scotland City Region Deal (ESES CRD) were not available at the time of preparing the proposed plan, or indeed currently, and as such further information in relation to cross boundary delivery mechanisms could not be included in the policy or consultation. Policy Inf 3 does confirm that for strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

The sentence asterisked under Policy Inf 4 explains that the identified transport proposals in part 4, tables 3-10 and interventions set out in the place policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis (CD014).

The TA also states in its Summary of Transport Impacts and Mitigation Measures that “analysis of the impacts of the transport demand of the new developments has shown that the proposals for the brownfield locations and five further strategic sites can largely be accommodated without substantial local and/or wider transport network problems.” The TA has analysed the potential cross boundary impacts of the proposed developments. The other sentence asterisked under Policy Inf 4 states that the policy requires that proposals to carry out further assessment at the planning application stage to further inform any local impacts and to take account the impact of any windfall sites progressed through the housing policies. **No modification proposed.**

#### Stirling Developments Limited (0303)

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Councils sustainable transport targets and where, commensurate, to the scale of the proposed development.

The plan clarifies that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place Policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis (CD014). The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Where necessary to mitigate cumulative impacts, contribution zones will apply. These will demonstrate the direct relationship between development, either individually or cumulatively and the need for that infrastructure. For strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

Paragraph 3.198 states that it is the Councils preference that infrastructure is directly

delivered by developers wherever possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions shall be sought. The details of the actions are also set out and updated in the Plan's action programme (CD008).

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development.

All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD119). **No modification proposed.**

#### Suzanne McIntosh (0409)

Phasing of development has a dependency on landowner and developer decisions and timings. Therefore, the specifics of timing of infrastructure provision where required are part of planning application considerations. Most will be delivered with development and so will follow the delivery and phasing timescale of development at project level. Where development has a dependency on infrastructure provision that will be part of the project level considerations these will be controlled by conditions on the application. Subsequent action programmes (CD008) will be updated and will provide more detail on delivery timescales as development proposals come forward and are continually informed by the pace of housing completions as evidenced by the Council's annual housing land audit and completions programme (CD055). The Council considers the actions and the Plan's strategy to be delivered within the timeline of the Plan. **No modification proposed.**

#### Crosswind Developments Ltd (0184)

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Council's sustainable transport targets and where, commensurate, to the scale of the proposed development. The Council considers the wording of policy Inf 3 to be suitably robust whilst still providing the required degree of flexibility.

It is a commitment within the Edinburgh and South East Scotland City Region Deal (ESES CRD) to produce a Developer Contributions Framework based on the outputs of the Cross Boundary Study (2017). This commitment is also reflected in the draft NPF4 (CD099). The Council feel that the inclusion of criterion (e) of Inf 3 is therefore reasonable. The Council's position with regards to healthcare contributions and green/blue network contributions can be found in issue 27. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

Policy Inf 3 states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts.



This will include any impact upon existing pedestrian infrastructure and required active travel mitigation and improvements identified. Criterion (d) of policy Inf 3 states that proposals will be required to deliver or contribute towards public realm where identified for the town centres or projects delivering the Council's City Centre Transformation (CD060), which are people focussed and address pedestrian movements as a priority.

The plan states that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place policies take into account the cumulative impact with other sites in the plan, from the Transport Appraisal modelling and analysis (CD014). The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Policy Inf 3 states that where, by nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions shall be sought. All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD055).

The Council considers the wording of policy Inf 3 is suitably robust and will ensure that development will deliver the strategy. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599) Miller Homes Ltd (0649)

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development.

The Council considers that it has set out sufficient detail in the plan and all existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD055). The wording of policy Inf 3 is suitably robust and will ensure that development will deliver the strategy. **No modification proposed.**

CoMoUK (0728)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport.

Part 4 of the plan sets out the proposals to deliver the strategy and policies, which includes identified proposed mobility hubs. Criterion (a) of policy Inf 3 states that proposals will be required to deliver or contribute to transport proposals and safeguards from part 4, tables 3-10 and/or interventions identified in transport assessments and/or transport consultations in accordance with policy Inf 4. The place based policies contained within the plan also provide indicative positions of proposed mobility hubs. Policy Inf 7 criterion (f) also states that for major new developments, and where

identified in a place policy or Development Principles, shared mobility services shall be provided and be conveniently located close together and near to public transport stops, potentially in a “mobility hub” with additional services, located with good natural surveillance. The Council considers the wording of policy Inf 3 is suitably robust and will ensure that development will deliver the strategy **No modification proposed.**

#### Newcraighall LLP (0466)

Infrastructure cannot always be delivered on land within the control of the applicant. One example of this is an active travel route, which, by its characteristics, its nature, often continues out with the site. Another example is of schools. The Council would not expect a developer to always be able to build a school on their land, however developer contributions would be sought to mitigate the impact of the development.

Policy Inf 3 notes that proposals will be required to deliver or contribute to the infrastructure provision listed in criteria (a-e), where relevant and necessary, to mitigate\* any negative impact (either on an individual or cumulative basis) and to ensure the proposal can meet the Councils sustainable transport targets and where, commensurate, to the scale of the proposed development.

The plan clarifies that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place Policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis (CD014). The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Where necessary to mitigate cumulative impacts, contribution zones will apply. These will demonstrate the direct relationship between development, either individually or cumulatively and the need for that infrastructure. For strategic infrastructure projects of regional significance, the Council will continue to work with partners across the region for an approach to funding.

Paragraph 3.198 states that it is the Councils preference that infrastructure is directly delivered by developers wherever possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions shall be sought. The details of the actions are also set out and updated in the Plan’s action programme (CD008).

Paragraph 3.199 states that planning guidance will set out the exceptions and mechanisms for the detailed calculation of proportionate contributions within a contribution zone. It will detail the relationship of development and infrastructure action(s) with its appraisal source for their identification. Developer contributions must be proportionate and attributable to the impacts of the development.

All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD055). The Council considers the wording of policy Inf 3 is suitably robust and will ensure that development will deliver the strategy. **No modification proposed.**



The Davidson's Mains and Silverknowes Association. (0454)

City Plan's spatial strategy has been informed by the Transport Appraisal (TA), (produced by Jacobs) (CD014) as well as the CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072).

The TA has modelled the impact of the plans spatial strategy and compared its impact with alternative spatial strategies. The planning objectives of the TA is to follow the transport hierarchy and aligning with and helping to deliver the CMP objectives.

Policy Inf 3 states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where by the nature of the infrastructure, it cannot be delivered directly, developer contributions shall be sought.

The plan makes it clear that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place policies take into account the cumulative impact with other sites in the plan, from the Transport Appraisal modelling and analysis. The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Applications will also be assessed at the planning application stage to ensure that they are fully compliant with policy Inf 3. The Council considers the wording of policy Inf 3 to be suitably robust and it will ensure that development delivers the strategy. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

City Plan's spatial strategy has been informed by the Transport Appraisal (TA), (produced by Jacobs) (CD014) as well as the CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072).

Proposed infrastructure investment is set out in the CMP and work on regional or national investment in infrastructure is set out in Strategic Transport Project Review 2 (STPR2) (CD111). The spatial strategy of the plan aligns with these.

Policy Inf 3 states that development will be supported where there is sufficient infrastructure capacity already available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where by the nature of the infrastructure, it cannot be delivered directly, developer contributions shall be sought.

The plan makes it clear that the identified transport proposals in part 4, tables 3-10 and interventions set out in the Place policies take into account the cumulative impact with other sites in the plan, from the Transport Appraisal modelling and analysis. The plan requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Applications will also be assessed at the planning application stage to ensure that they are fully compliant with policy Inf 3.

All existing and future developer contributions sought will be done in accordance with the requirements of Circular 3/2012 (CD055). One of the four key outcomes of the City Plan is by 2030, we want Edinburgh to be a city where you don't need to own a car to move around. The proposals included in part 4 of the plan will benefit all the residents of Edinburgh.

The Council considers the wording of policy Inf 3 to be suitably robust and it will ensure that development delivers the strategy. **No modification proposed.**

West Town Edinburgh Limited (0660)

Place 16 states that the Council will coordinate a collaborative, multidisciplinary master plan approach to development across West Edinburgh.

Paragraph 3.197 states that planning guidance will set out the mechanism for the detailed calculation of proportionate contributions within a contribution zone as well as any exceptions. It will detail which appraisal identified the impact of development on existing infrastructure capacity and recommendations of mitigating actions. **No modification proposed.**

Katherine Kennedy,(0569) Liberton & District Council (0084), SEPA (0012),

Support Noted.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 31</b>	<b>Transport Strategy</b>	
<b>Development plan reference:</b>	Part 3: Page 126, page 129- page 130, Part 4: Table 6 page 172, Table 7 page 173, Table 8 page 174-176, Table 9 page 177.	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <p> Alan Stevens (0646)  Alasdair Gillies (0035)  Alistair Mackintosh (0650)  Andrew Longmate (0705)  Anna Goodwin (0302)  Archie Clark (0003)  Avison Young for Aldi Stores Ltd (0526)  B Hyland (0792)  Barratt David Wilson Homes (0677)  Bo Adams (0363)  C van der Dussen (0558)  CALA Management Ltd (0465)  Capital Rail Action Group (0789)  Catherine Labinjoh (0711)  Claire Graf (0541)  Cockburn Association (0777)  Connie Longmate (0707)  Corstorphine Community Council (0799)  Cramond &amp; Barnton Community Council (0243)  Crosswind Developments Ltd (0184)  Cynthia Shuken (0632)  Dandara East Scotland (0757)  Despoina Papadopoulou (0575)  Donald Macaulay (0188)  Edinburgh Access Panel (0620)  Edinburgh Airport Limited (0761)  Forth Ports Limited (0496)  Frances Guy (0589)  Fraser Wilson (0536)  Friends of Cammo (0387)  Gareth Wheeler (0636)  Gavin Cameron (0782)  Genna Spears (0081)  Graham Jones (0340)  Grange/Prestonfield Community Council (0192)  Hallam Land Management (0599)  Hallam Land Management (0615)  Hannah Coulson (0331) </p> </div> <div> <p> Heather Duque (0746)  Heather R Finnegan (0664)  Homes For Scotland (0404)  Inverdunning (Hatton Mains) Ltd. (0427)  James McMeekin (0631)  Jakub Szwedowicz (0547)  Jean Morley (0461)  John Watt (0321)  John Yellowlees (0024)  Jordan Thomson (0676)  Joseph Coulson (0017)  Julie Roberts (0210)  Juniper Green &amp; Baberton Mains Community Council (0306)  Kasper Schwartz (0576)  Katarzyna Wozniak (0546)  Katherine Kennedy (0569)  Lady Road Investment S.A.R.L. (0625)  Leith Central Community Council (0614)  Leonard Wallace (0314)  Liberton &amp; District Community Council (0084)  Living Streets Edinburgh Group (0486)  Louise Baker (0773)  Lynn Grattage (0362)  Mark Beaumont (0752)  Mark Ockendon (0419)  Mattia Ventre (0763)  Michael Ramsay (0011)  Mike Richardson (0109)  Miller Homes Limited. (0256)  Miller Homes Limited (0649)  Miller Homes Limited and Wheatlands Farming Partnership (0592)  Mr Cuchulainn Gent (0047)  Mr John G. Skinner (0065)  Mrs Patricia Scott (0349)  Murrayfield Community Council (0146)  National Galleries of Scotland (0725)  NatureScot (0528) </p> </div>		

<p>Hannah Knechtli (0259)  Network Rail (0071)  Patrick Longmate (0708)  Pawel Stankiewicz (0445)  Peter Allen (0336)  Peter Brown (0672)  Peter Moonlight (0550)  Portobello Amenity Society (0612)  Ratho and District Community Council (0289)  Robert Drysdale (0354)  Robert Falcon (0640)  Rodger Musson (0162)  Rosebury Estate (Bankhead) (0618)  Royal Highland &amp; Agricultural Society of Scotland (0482)  Sandra Labinjoh (0690)  Sarah Adamson (0523)</p>	<p>SEPA (0012)  Shawfair LLP (0258)  Simon Hindshaw (0095)  Sophia Lycouris (0667)  Spokes Lothian (0545)  Steve Loomes (0767)  Sustrans (0561)  Suzanne McIntosh (0409)  Tarmac (0244)  The Davidson's Mains and Silverknowes Association (0454)  Theo Spanellis (0415)  Transport Scotland (0480)  University of Edinburgh (0464)  West Craigs Limited (0472)  West Town Edinburgh Ltd (0660)  Wright PDL (0078)  Zuleika Connolly-Jones (0656)</p>
<p><b>Provision of the development plan to which the issue relates:</b></p>	<p>Inf 4, Inf 5, Inf 11, Inf 13, Inf 14, Inf 15. Table 6, 7,8, 9 and Erratum.</p>
<p><b>Planning authority's summary of the representation(s):</b></p>	
<p><b><u>Transport Strategy and General Comments.</u></b></p> <p><u>Cramond and Barnton Community Council (0243)</u></p> <p>The Outcome 'A city where you do not need a car to move around' is too narrowly focussed on restraining car use. It should be phrased more positively to focus on the provision and promotion of high quality and readily accessible public transport services, active travel routes, and education and healthcare provision.</p> <p><u>Homes for Scotland (0404), Wright PDL (0078), Steve Loomes (0767)</u></p> <p>No objection to the aspiration, 'A city where you do not need a car to move around' but the plan policies will stop the city achieving them. The displacement of businesses may lead to an increase in car dependence for some, as these businesses may well relocate to more peripheral areas, increasing the need for work trips by car. Object to the fact the Council does not appear to have properly considered this. It requires to be established that the sites allocated are inherently more accessible via public transport/active travel options than non-allocated sites.</p> <p><u>Living Streets Edinburgh Group (0486)</u></p> <p>To deliver on, 'A city where you do not need a car to move around' particularly the excellent statement in 2.111, development location/type and supporting infrastructure need to be prioritised accordingly and the Council has to call a halt to the current way of</p>	

bringing development forward. Make it abundantly clear to developers that proposals which do not accord with this outcome and the transport hierarchy will be refused.

Support the introduction/aims section if you include reference to the Transport Hierarchy as set out in Scottish Planning Policy and the National Transport Strategy and the priority given to walking within the hierarchy which is now Council policy as articulated by the Convenor of the Transport Committee. A plan underpinned by walking will help deliver on ending poverty and wellbeing/equalities.

Gavin Cameron (0782)

In order to achieve, 'A city where you don't need to own a car to move around', there requires equal access to public transport across the city and for Cramond this is not the case. Cramond has never been suitably invested in.

Archie Clark (0003)

We need cars because the city has been designed for the car – not public transport, or bikes, or wheelchairs, or walking. Paragraph. 2.113 "We are committed to the reduction of traffic and traffic-borne air pollution" It is difficult to see this except in a very few city centre locations. To what extent largely untried novel ideas like LEZ's, mobility hubs, smart electric vehicle charging have been investigated and proved to be workable before being included in this Plan? Little point in defining LEZ areas as technology will result in older vehicles being replaced by more efficient designs that reduce pollution. LEZ will penalise those who have to use older technology. People will move out of the City Centre to shop elsewhere and be unable to visit friends.

"City Mobility Plan will widen travel choice and reinforce the national sustainable travel hierarchy that promotes walking, wheeling, cycling, public transport and car sharing in preference to single occupancy car use". That is being unduly optimistic with covid rife. The statement: "This will enable us to meet our target for a reduction in car kilometres by 20%" is not supported by any evidence and cannot apply in a City that for many years has had to become more car dependent as local facilities have been allowed to disappear.

Robert Drysdale (0354)

Supports City Plan Spatial Strategy section in all respects other than the transport aspects, specifically the maps on pages 9 and 10. The outcome 'A city where you don't need to own a car to move around' is verging on meaningless as, for the vast majority of citizens and visitors, this outcome already applies with the exception of those who suffer from mobility impairments. Public transport must become faster and more convenient than using the car if a reduction in car miles is to be achieved. Further expansion of suburban railway services and new stations will also be needed. The aim therefore should be to create 'A city where you don't need to use a car in order to move around quickly and efficiently'.

Crosswind Developments Ltd (0184)

Map 8 which has no reference or title but is concerned with movement and access is inconsistent with Map 1 and the errata and as such must be amended. It shows active travel as yellow but also as purple which is the same colour used for public transport. It

also does not show any active travel in West Edinburgh or how any of these routes join up or connect from significant starting points to significant destinations. Map 9 has no reference or title. The maps in this section would benefit from having policy references to aid the reader. It is unclear why subsections entitled Education Appraisal, Healthcare Appraisal, Resources and Services would be found under the heading “A city where you don’t need to own a car to move around”

Leith Central Community Council (0614)

Paragraph 2.30 states that the City Plan and Mobility Plan will enable us to meet our target for a reduction in car kilometres by 20%. This reduction seems small. What is the rationale behind this figure? Electric vehicle charging facilities are not properly accounted for. They should be encouraged for e-bikes and for shared or non-private car use. Many jobs rely on the use of private vehicles (trades, deliveries, etc) and will continue to do so in the near future.

Frances Guy (0589)

Considers that at paragraph 2.30 the city could have a more ambitious target for reducing car use especially as the city's own figures suggest that 50% of car use is short distance. Suggest increasing the target to a reduction of 40% and include a specific target for reducing car use to attend schools.

Hallam Land Management (0615)

Reference to the City Mobility Plan, the Edinburgh Sustainable Transport Study and associated strategic transport impacts related to the spatial strategy need to be more explicit in City Plan. The Mobility Plan needs to reference post-Covid travel patterns and the need for economic resilience. The Proposed LDP should identify how accessibility and public transport will be improved for the residents of Balerno rather than restraining development and investment. There may be a case where housing development can facilitate improvement to existing service provision. There is a lack of clear linkage between transport infrastructure and new neighbourhoods in relation to phasing and programming of development in this part of Edinburgh.

Whilst a shift to more sustainable modes is welcomed this will be predicated on financial investment to generate improvements in locations such as Balerno. City Plan fails to take into account any changes to travel demand which will prevail in the future and is planning for a congestion scenario without improvements to public transport services. Commuting is an issue for Balerno and requires investment, not an embargo on essential housing. A reduction of traffic and traffic-borne air pollution will be achieved by a change in behaviours and new technology. The ‘Edinburgh Strategic Sustainable Transport Study, Regional Transport Strategy and Strategic Transport Projects Review 2’ are not available for consultation as part of the LDP which is reliant on these assessments.

Tarmac (0244)

There is a large degree of reliance on the City Mobility Plan within City Plan 2030 and the Edinburgh Sustainable Transport Strategy which support investment in sustainable public transport as shown in paragraph 2.26. The interim Regional Spatial Strategy is based on

the Strategic Development Plan 2 spatial principles and City Region Deal projects. Again, this is not a legitimate basis for strategic planning and cross boundary co-operation across the SESplan area. Likewise, the transport assessments which 'underpin the opportunities for progress to be made to support better connectivity and access to jobs across the region whilst also supporting transition to net carbon zero movement' cannot be considered as legitimate guidance that have been consulted upon as part of this LDP process, which is therefore deficient.

Development can facilitate improvement to existing service provision, for example introduce and finance new bus stops on existing routes, or influence bus routes. Bairdview will increase potential patronage making existing supported services more viable.

Mark Ockendon (0419)

We should focus on the problem - reducing carbon emissions, increasing mobility and convenience - rather than vilifying the car. There are a range of ways this can be addressed including free and better connected public transport, low-carbon and electric vehicles with a network of EV charging points, better management of road works and traffic lights. Low-carbon transport ambitions should not be at the expense of convenience. People in many areas of Edinburgh have inefficient bus links, a presumption against cars leaves many people with limited options. A further study of the bus network and route layouts should be undertaken, not just from a cost/efficiency perspective, but also from a quality-of-life perspective (access and journey times). The cost of public transport is often more expensive than using a car for short journeys and hits the poorest hardest. A policy aim to provide free public transport for all local residents would be socially equalising.

Juniper Green & Baberton Mains Community Council (0306)

Regarding the Low Emission Zone for the city centre (section 2.30, page 13), we believe this must be introduced only after transportation changes have been implemented. If public transport has not improved, poorer residents will continue with older vehicles and thus are the ones who will be affected most. This would be contrary to the Plan objective (section 2.33, page 14) of Ending Poverty by 2030. The probability is that people would move out of the city centre to shop elsewhere, which does not represent sustainable development, and would also result in people parking outside their area in order to avoid being fined.

Regarding section 2.114 we would have liked to see more detail regarding the plan for "Edinburgh's mass transit network, including proposed new public transport actions".

Alasdair Gillies (0035)

In relation to paragraph 2.17, I don't support cars being at the bottom of the priority list. There are many areas in Edinburgh where public transport is poor (and no prospect in your proposals of improving) - eg Cramond to Edinburgh Park, the main hospital and city centre. With electric cars becoming the norm, I want the council to stop deliberately making it difficult to travel by car. Make it part of the mix, I simply can't walk or take the bus to work, there's zero options. And stop using spaces for people as an excuse to put bus lanes in without proper consultation.

Jean Morley (0461)

Older people would need more accessible / reliable public transport to make the strategy of being a city where you don't need a car to move around a reality. Bus services need to serve the whole city 24/7

SEPA (0012)

Supports the strategy of Edinburgh being a city where you don't need a car to move around but would highlight that CEC must also deal with historic planning decisions which have seen developments without high quality sustainable travel links, for this outcome to be achieved.

Sarah Adamson (0523)

The A8 corridor like many others in the city are plagued by idling traffic. In Corstorphine the air pollution has been highlighted as a major problem for over 30years. Yet the traffic still idles and creates health related problems.

Donald Macaulay (0188)

The plan is laudable but unless the basic infrastructure (roads and pavements) are maintained it will fail. Potholes are a menace to cyclists and drivers. Poor paving leads to falls and injuries

Genna Spears (0081)

There should be no dedicated cycle lanes. Do not remove parking spaces and introduce parking permits.

Rodger Musson (0162)

Society cannot keep going on as before if emissions are to be reduced. Developers are working on the assumption that all resident families will have at least one car and most likely two and will drive everywhere. Any new housing must be planned with local facilities - shops and schools - and adequate public transport links. Proposed developments that do not include this must be refused. It is up to the City Council to put in place measures to enforce policies to reduce car use in new housing estates.

Julie Roberts (0210)

Charging hubs for electric vehicles, need to be widely available, especially in areas where there are lots of flats/apartments, who don't have private gardens. We cannot & should not expect everyone to give up the use of a car. It takes away personal freedoms, especially as people get a bit older and cannot ride a bike or walk as much everywhere. Public transport links are not good for many places of interest, that you might want to visit. Public transport needs to be better thought out when planning timetables. Currently, we have a service which seems to provide buses almost back to back at times and then nothing for 15 to 20 minutes thereafter.



#### Dandara East Scotland (0757)

Parking requirements must be based on the levels of accessibility. It is important that maximum parking standards within new developments are based on levels of accessibility throughout the City. Although the city centre and surrounding areas are highly accessible, there are parts of the City (particularly on the outer edges) that do not benefit from such high quality public transport and/or pedestrian/cycling infrastructure (e.g. Kirkliston, Balerno).

Therefore, to suggest that areas which have lower accessibility levels 'don't need to own a car' should not be supported. Particularly within residential developments, sufficient parking standards are essential.

#### **Action Programme.**

#### Hallam Land Management (0599), Miller Homes (0649), CALA Management Ltd (0465)

The transport proposals identified under sections 2-8 of the Action Programme are understood to be required to support the delivery of the Council's development strategy. The purpose of the Action Programme should, therefore, be to provide sufficient details on each of these proposals, including costs, timescales and how the proposals are to be delivered. However, the Road Improvements set out in tables have no costs or timescales associated with the delivery of each proposal. It is therefore not possible to define the extent of the proposals listed or how these will be used to address the impact of the proposed development set out in the Proposed LDP and the Council's development strategy. This does not meet the policy tests of Planning Circular 3/2012 and a developer will not be able to determine the extent of any financial contributions that will be required towards the delivery of infrastructure proposals or how it relates to the delivery of their proposal. The Action Programme does not provide these details. The Action programme also does not meet the minimum requirements for an Action Programme with regard to infrastructure requirements, as set out in Circular 6/2013 and the 2008 Regulations. In failing to provide sufficient details or costs for the delivery of infrastructure proposals, the Council has not demonstrated that these proposals are deliverable or can be delivered within the timescales of the Proposed LDP.

#### Cramond & Barnton Community Council (0243)

Have considerable concern that so many component elements of the City Plan 2030 Action Programme do not have any target delivery timescales and only show 'with development' or 'TBC'. This gives our communities no confidence that 'infrastructure first' principles will be adhered to. Experience of current major developments, resulting from the previous LDP, shows that essential infrastructure has not been, and is not being, delivered in pace with housing development, with LDP Action Programme timescales being 'rolled over' annually with delayed timescales, which, in turn, are unlikely to be met.

#### Tarmac (0244)

The Proposed LDP should identify how accessibility and public transport will be improved for the residents of Ratho. There is a lack of clear linkage between transport infrastructure and new neighbourhoods in relation to phasing and programming of development in West Edinburgh.

## **Transport Appraisal.**

### (0615) Hallam Land Management

The city wide Transport Appraisal sets out the infrastructure actions required to deliver the growth within the plan without assessing how existing problems may be mitigated by development. It refers in paragraph 2.116 to changing travel patterns as a result of Covid-19, however no evidence of this was presented at Choices.

### Tarmac (0244)

City Plan fails to take into account any changes to travel demand which will prevail in the future and is planning for a congestion scenario without improvements to public transport services. The Transport Appraisal sets out the infrastructure actions required to deliver the growth within the plan without assessing how existing problems may be mitigated by development. It refers in paragraph 2.116 to changing travel patterns as a result of Covid-19, however no evidence of this was presented at Choices. A reduction of traffic and traffic borne air pollution will be achieved by a change in behaviours and new technology. Whilst a shift to more sustainable modes is welcomed this will be predicated on financial investment to generate improvements in locations such as Ratho. We have major misgivings of the LDP process and whether due consultation has taken place in relation to Ratho and the A8 corridor.

### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Concerned to note that, despite the 'brownfield first' policy, indistinct diagrams in the Jacobs Transport Assessment continue to show 'Residential Development Sites' and 'Site Mitigation' measures in the green belt between Baberton and the A71 and between Baberton and the A71, at Goodtrees and near the Gogar roundabout. Despite promises that there would be no greenfield development, 'Land East of Riccarton' features in Fig. 6.3.

### Inverdunning (Hatton Mains) Ltd. (0427)

A series of uncertainties in relation to the proposed City Plan and its background supporting documents including the City Mobility Plan and accompanying Transport Assessment (prepared by Jacobs) have been identified. These focus predominantly on uncertainties based on assumptions made to accommodate impacts on travel behaviours caused by the COVID-19 pandemic on the modelling work. These could cast doubt on the veracity of the results produced and therefore the evidence used by CEC to allocate residential sites in the proposed City Plan. Hatton Village is supported by transport and mobility grounds. Based on the above, reconsideration to the allocation of the proposed site for Hatton Village.

Line 1 of 2.112, Outcome 3 - A city where you don't need to own a car to move around should be amended.

### CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

The proposals set out in table 6-7, 8-9 or 10 of the City Plan 2030 Proposed Plan (Proposed LDP) are not based on a reliable or robust assessment which evidences the requirement for the delivery of these proposals. The Transport Appraisal prepared in support of the Proposed LDP does not provide any analysis of each of the proposals and the impact these will have on the existing active travel network within the local authority. It is, therefore, not possible to determine whether the delivery of these proposals will provide any tangible improvements to the existing active travel network.

Table 6-7, 8-9 and 10 of the Proposed LDP also fail to provide any details or associated costs for the delivery of these proposals. It is, therefore, not possible to determine what each of the proposals will deliver or, indeed, whether they are required. The Transport Appraisal Technical Note (the Note) makes reference to twenty-minute neighbourhoods. The requirement for 20 minute neighbourhoods is not set out in any approved national planning policy or guidance and should not be afforded any weight in the preparation of the Proposed LDP.

The Council has failed to demonstrate that it has fully assessed the impact of all proposed sites for residential development within the Proposed LDP on the existing road network. The Council's Assessment has also failed to take account of all sites identified within Option 3 of Choice 12 of the MIR. The exclusion of these sites (and those which formed part of Option 2 of Choice 12) is contrary to the Council's statement that the Assessment ...was required to assess both the 'preferred approach' and the 'reasonable alternatives' approach of Choices for City Plan, the Main Issues Report (MIR) stage of the plan process.

The Proposed LDP identifies the site known as IBG2 as having capacity for 7,000 homes (reference: H63 Edinburgh 205). This is 2,000 homes more than was identified in the Assessment. It is, therefore, unclear if the Council has properly assessed the impact of the proposed 7,000 homes on the existing transport infrastructure.

The Assessment does not set out any clearly defined robust measures to ensure any car use resulting from the proposed residential development at IBG2 would be ...notably low in comparison with other similar developments and does not demonstrate how this makes the site at IBG2 more sustainable than for example the allocation of Land south east of Gilmerton (the Drum) which was also considered as one of the other three greenfield sites identified in the Assessment. The Assessment also fails to consider that these existing tram facilities will be utilised by existing development at this location.

The Assessment does not explain why the Council has ignored the findings of the Assessment which indicates that the site at Land south east of Gilmerton (the Drum) is more sustainable than that at IBG2. Nor does the Council explain why it has not allocated any other greenfield sites assessed as part of the MIR which had significantly less transport impacts.

#### Liberton & District Community Council (0084)

Liberton & District Community Council is concerned that the Transport Appraisal does not appear to take account of major housing developments in Midlothian which generate traffic movements across Council boundaries, particularly to Fairmilehead, Liberton, and Gilmerton. The proposed A701/ A702 relief road to Straiton is of particular concern. There appears to be no proposals for mitigating these traffic flows.

## **West Edinburgh Transport**

### Royal Highland & Agricultural Society of Scotland (0482)

Development principles of City Plan are supported in terms of West Edinburgh. In terms of WETA and interventions required, City Deal is the key focus for funding and delivery.

### Living Streets Edinburgh Group (0486)

No objection to locations, but there has to be clear reference to the transport hierarchy Scottish Planning Policy and National Transport Strategy throughout. The scale and location present challenges, but there is no reason why pedestrian priority and a largely car free development cannot be an underpinning principle. Contributions need to be secured to carry out the necessary enhancements to tram, rail, bus, pedestrian and cycle infrastructure thereby reflecting the transport hierarchy.

### Transport Scotland (0480)

The Transport Appraisal accompanying the LDP ('City Plan 2030 Transport Assessment, September 2021) details an impact on the M9 southbound on-slip at Newbridge roundabout as a result of cumulative impact of the developments in West Edinburgh. The impact presented details a 50% increase in Passenger Car Units over a 2 hour period, an increase of 854 in the AM period. This is a significant increase which requires measures to be implemented to promote a significant shift to sustainable travel modes and development phasing implemented to minimise the impact.

Further detail is required on the new tram stop (WE30) within Table 8 – West Edinburgh Transport Improvements as there are no details provided on its delivery. The tram stop is included within the Transport Appraisal as one of the measures recommended to assist in the mitigation of development impact, however this does not follow through to the plan.

The Proposed Plan does not include information on the phasing of development or linking the delivery of infrastructure to development phasing. This is an important in ensuring that development does not progress prior to the provision of required infrastructure to ensure the required shift to sustainable modes of travel is embedded from the outset. This is vital for mitigating the cumulative impact of the developments as detailed within the Transport Appraisal or delivering mode share targets and to avoid unacceptable impacts on the safe and efficient operation of the trunk road network in the absence of appropriate mitigation being delivered to address these impacts.

The delivery of sustainable transport measures from the outset and in the early phases of development is vital to minimise the impact on the M9 southbound on-slip as detailed within the LDP Transport Appraisal and to ensure the infrastructure provision for traveling by sustainable is available from the outset in line with national and local policies.

Joint representation made by Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761), West Town Edinburgh Ltd (0660). (See supporting documents: Crosswind Developments Ltd, Edinburgh Airport Limited, West Town Edinburgh Ltd)

Edinburgh Airport Limited (EAL) Crosswind Development (CDL) and West Town

Edinburgh (WTE) have collaboratively worked and have agreed a Movement and Access Framework plan. The joint Movement and Access Plan isn't constrained by individual site boundaries and that takes its lead from the indicative arrangements identified on the Proposals Map, Map 1, Map 2 and Map 8 (although we note that these are not correct as per the errata) and Map 24. EAL, CDL and WTL are committed to collaborating but are agreed that each party must be free to develop to their own programme. Early agreement on a Movement and Access Plan will allow this to happen within a co-ordinated framework.

The Transport Assessments states: "We have made assumptions regarding which transport investments will be delivered by 2030. These are 'reference case transport interventions', assumed to be delivered regardless of City Plan 2030 proposals, and as such do not need to be considered as City Plan 2030 mitigation measures. This clearly identifies that the WETA refresh 2016 road proposals are assumed to be delivered by 2030. This is welcomed and is interpreted to mean that policy support for interventions described on pages 31-36 of the WETA refresh document will remain throughout the lifetime of City Plan 2030. Notably the Airport / IBG Link Road, Eastfield Road upgrades, A8/Eastfield Road Dumbbells, Gogar Widening and, Gogar Roundabout to Maybury upgrades. Indeed, the recently approved (December 2021) LDP Action Programme contains these interventions and sets out the delivery timescales up to 2030. The Council's support for the WETA interventions is therefore already established and is set to continue. As these are already planned for, they are not included as mitigations or interventions to be included in the plan, although it would be useful to show these on the proposals map.

The Transport Assessment in Figure 5.26 identifies Committed and Potential Development Infrastructure but omits the Airport Link Road. We take it that this is an oversight and that it should have been included as it is a requirement of WETA 2016 (TR-CZ-WETA-18). Figure 5.27 does show the Airport Link Road in terms of a Public Transport connection. The Airport Link Road is still very much needed as it provides access to WTL land, Crosswind land and West Craigs land while importantly relieving the congestion on Eastfield Road.

In terms of unlocking the development of the West Edinburgh area identified by Policy 16. EAL, CDL and WTL have identified the following interventions as critically needed. These are shown in the Movement and Access Plan. (See supporting documents)

It should be noted however that while CDL's masterplan is evolved, WTL's is not, and therefore at this stage the internal layout, form and function of all roads from the eastern boundary of WTL's ownership to Eastfield Road to the west including any interventions on to the A8 will be deferred to their masterplan process, transportation assessment and the requirements of WETIP if appropriate. The representations to follow will suggest text to cover this flexibility adequately and it may be appropriate to annotate Map 24 which we will be asking to be amended to reflect the agreed Movement and Access Plan and for this to be included in the PLDP accordingly.

Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761)

CDL, EAL and WTL have been working collaboratively and have agreed a Movement and Access Framework plan. (See supporting documents: Crosswind Developments Ltd, Edinburgh Airport Limited, West Town Edinburgh.) CDL, EAL and WTL request that this

Movement and Access Framework Plan is recognised as the basis for co-ordinated development in West Edinburgh. The Movement and Access Framework plan should replace the current Map 24 of the proposed City Plan.

The requirement of a collaborative masterplan should be removed from Place Policy 16 as this agreed Framework means that a West Edinburgh Wide masterplan is not required as it would provide a level of detail to co-ordinate development between the neighbouring development sites while allowing each developer the opportunity to bring forward their own master planning proposals for consideration by the Council. As the policy stands it will cause significant delay to the development of important vacant/brownfield sites in the city. The Council can successfully co-ordinate development to ensure the sites work together without the need for a full masterplan to which all parties must accord.

On this basis, CDL and EAL wish to amend the text to remove the reference to an approved masterplan which is set out below. Amendments to criteria (L) (M) (N) and (O) in the West Edinburgh Development Principles should be made. Criterion m should include the Airport Link Road and IBG Main Street which are WETA priorities to support development in the area and provide resilience for the existing road network.

Map 24 does not reflect or recognise 2 recent planning applications (20/03219/PPP and 21/00217/FUL). Each of these were accompanied by detailed justifications for new proposed road alignments which were tested through TAs, EIAs, LVIAs and in terms of Design and Access Statements. These applications clearly represent the needs and development ambitions of the landowners (CDL and EAL) yet have not been adequately reflected on Map 24. CDL would like to see better alignment between these live proposals and the Proposed Plan. The map is not marked as indicative (others in the proposed plan are). This must be made clear so applications can deviate slightly from what is shown.

Given the assumptions of the Transport Appraisal (Table 2.1) a number of WETA Refresh 2016 (WETA) interventions should be included on the Proposals Map and map 24. Without these transport and movement is not adequately planned for in the city to 2030 and the conclusions of the Transport Appraisal are not correct.

The proposals fails to identify TR-CZ-WETA- 17. Although in Table 8 of the document it would appear that it is proposal WE28 and Road proposal R4 in Table 9. Table 8 identifies this as a dual carriageway which is consistent with WETA that says this is required when Airport and IBG traffic comes together. Given the only connection shown to the airport on the Proposals Map is when this road connects to Eastfield Road this would suggest that the whole connection from Gogar Roundabout through IBG requires to be Dual Carriageway. This is wholly unacceptable, both in placemaking terms and as the route of this road is identified as wrapping round the Grade A listed Gogar Castle and travelling through a Local Area for Nature Conservation.

The proposals map fails to identify TR-CZ-WETA- 18 correctly instead confusing this WETA intervention with TR-CZWETA- 6. This means that no link road to the Airport is shown which WETA identifies as needed to "improve network resilience to Edinburgh Airport and to open up of development opportunities in West Edinburgh." TR-CZWETA- 6 is the new main street for IBG and is identified in Table 8 as WE26 but it is not identified on the Proposals Map. Instead as stated above TR-CZ-WETA- 18 and WE29 are identified running through the middle of IBG and out on to Eastfield Road. Given TR-CZ-WETA- 18 was conceived to remove traffic from Eastfield Road and provide a second

access for the Airport this alignment totally fails in that respect.

Further consideration of this and cross referencing with Table 8 suggests that this may be an omission from the Proposals Map that should be rectified. If transport proposal WE29 is what is described in the extant LDP Action Programme as TR-CZ-WETA- 18 then this is indeed the case

In addition, TR-CZ-WETA- 19 is contrary to the proposal in WETA. TR-CZ-WETA- 19 is shown not as a direct connection from Gogar Roundabout to the Airport but as a much less direct route to the Airport via IBG and Eastfield Road. This proposal is identified as WE27 in Table 8. This is contrary to the proposal in WETA which is clear that the segregated cycleway should be along section 1 and 2 of the proposed “Y” shaped road which are the dual carriageway section and the Airport Link Road section.

The omission of the Airport/ IBG Link Road which WETA identifies to reduce journey time variability, provide additional resilience for access to Edinburgh Airport, provide the opportunity for access to potential future development and enhance active travel connectivity from the plan has serious implications for the soundness of the plan.

It is imperative that the road interventions are brought forward from WETA and that these interventions are delivered in the plan period. All of these interventions need to be listed in Part 4 and identified on the Proposals Map, including the Airport Link Road which is missing from key maps. (See supporting documents: Crosswind Developments Ltd, Edinburgh Airport Limited, West Town Edinburgh Ltd

There are several discrepancies between Map 24 (page 73) and the proposed Proposals Map in terms of various route alignments. We also note the errata and the maps of the Plan should be updated and aligned between the Proposals Map, Map 24, Map 1 and Map 8. Table 8 (West Edinburgh Transport Improvements) needs to identify a new airport link road as a key transport improvement as well as ensuring the improvements identified in Part 4 are included on the Proposals Map.

The new primary vehicle route on Map 24 is also shown running directly through the Crosswind development site. This should be located on the eastern side, adjacent to the railway lines, to avoid running a Primary Road through the middle of the development site and a new local centre given the ambitions that this should be a car lite development. The only primary connection shown to the airport on Map 24 is when this road connects back onto Eastfield Road. This would not provide the needed resilience for traffic to and from the Airport and the wider area and accordingly an Airport Link Road as set out in the WETA Refresh 2016 (WETA 18) and in line with WE29 requires to be shown connecting to the Eastern Terminus. EAL propose that this is shown as an extension to the new primary route that we have requested is shown adjacent to the Railway line and that it should connect to the Airport Eastern Terminus via Eastfield Avenue.

With regards to connectivity in West Edinburgh, a further inconsistency is the routing of the North South Orbital Bus Route which is Table 8 proposal WE16. This is shown on the Proposals Map connecting from Edinburgh Park through Gogar Roundabout up Myreton Drive and into the West Edinburgh sites where via a new railway bridge it crosses into the Maybury housing development area before connecting with Craigs Road and Maybury Road. This proposal is not shown on Map 1 in this location and is completely absent from Maps 24, 26 and 27 which are the detailed maps of Policy 16 West Edinburgh, Policy 19

Edinburgh Park and Policy 22 Maybury in the Proposed City Plan 2030 written document.

An errata has been published but is not well publicised. This is hidden with the background documents and the interactive proposals map remains unchanged. This significantly disadvantages consultees and could be easily missed. This errata does not identify that not only is the Proposals Map incorrect but also the Spatial Strategy Maps 1 and 2 and Map 8 show Transport Proposals and Safeguards in the actual LDP document. This makes the soundness of the consultation process questionable

West Town Edinburgh Ltd (0660)

Supports the Gogar Link Road transport proposal, however City Plan should incorporate the 'movement and access' plan produced by EAL, CDL and WTL at as the basis for providing a Gogar Link Road and map 2 and 8 should be amended as such. (See supporting documents: Crosswind Developments Ltd, Edinburgh Airport Limited, West Town Edinburgh.)

Active travel routes proposed are supported, and additional routes and connections are proposed within the movement and access plan most notably to the Airport, Maybury and to the A8.

The proposed primary vehicle routes, as shown on Map 24, may impinge on the quality of place of the new local centres at West Town and Elements Edinburgh (CDL land) if it is to carry all traffic.

City Plan should also make clear that the route is indicative at this stage and may involve multiple stakeholders and development sites. It should be stated that the city council will ensure that delivery of the route will be appropriately managed and coordinated to the benefit of all development in West Edinburgh.

While CDL's masterplan is evolved, WTL's is not, and therefore at this stage the internal layout, form and function of all roads from the eastern boundary of WTL's ownership to Eastfield Road to the west including any interventions on to the A8 will be deferred to their masterplan process, transportation assessment and the requirements of WETIP if appropriate. The representations to follow will suggest text to cover this flexibility adequately and it may be appropriate to annotate Map 24 which we will be asking to be amended to reflect the agreed Movement and Access Plan and for this to be included in the PLDP accordingly.

Supports the principle of applying a cumulative Transport Contribution Zone to address the area wide transport interventions required to support new development and as identified through the Transport Appraisal and the outcomes of WETA/WETIP in support of the measures being delivered as part of City Deal.

It is assumed that any developer contributions will be proportionately determined considering any public transport infrastructure that may be delivered as part of an individual development proposal. Similar points should be noted in respect of transport proposal PT4 – West Edinburgh A8 public transport corridor. It should also be made clear within the Place 16 section of the proposed plan that IBG 1 (Which is identified on map 25) will also form part of the assessment of mitigation required arising from its impacts on



various infrastructure matters.

Supports the inclusion of a 'potential option for vehicle access' from the A8 into the site as shown on map 24 – West Edinburgh. It is essential that such an option is retained within City Plan for this site allocation.

West Craigs Limited (0472)

Generally supportive of the proposed transport interventions. However, request additional clarity within the policy wording to ensure that vehicular access to H62 and the Tram Depot will be safeguarded, as per the existing T9 (Gogar Link Road) allocation contained within the currently adopted Local Development Plan (2016).

Planning permission has been granted for the active travel bridge (WE8) and the active travel link (WE9). These interventions will enhance connectivity between H62 and West Craigs to the north and will deliver improved connectivity opportunities for all development sites within the vicinity of Edinburgh Gateway station.

Pending PPP application for the Gogar Link Road (ref: 21/02941/PPP) and active travel route broadly aligns with transport proposals WE29 and R4 and will deliver the first part of the Gogar Link Road as outlined within WETA. It will also deliver dedicated active travel infrastructure as required under the policy for Place 16 (West Edinburgh). And connect with the approved active travel bridge and link (WE8 and WE9 respectively). Changes are required to the route of WE16 and PT6. The proposed route will cut through part of HSG19, where a pocket park and SUDS facility have been consented and constructed. There are some errors in the wording of Place 16.

Rosebery Estate (Bankhead) (0618)

(WE12) is identified as a "potential route", and we maintain our objections to the potential link to the north with a landing point in HSG19 as it is committed and being brought forward for development as envisaged (still) in the HLA2020. Neither the potential public transport proposal (Ref: WE12), nor the proposed allocation from which it arises (land adjacent to H61), were included in the Choices Consultation and this is a significant unanticipated and unwelcome change to the plan.

The land take for a landing point for a bridge of this sort would be significant and once the associated embankments, suds etc were provided, there would unlikely be much land left for the housing being relied upon in the Council's established supply. This land is therefore not available for the landing point of a potential public transport corridor and should be considered to have a landowner constraint and removed as a viable option to be explored further at this stage. Under emerging Policy Env 2, this proposal may result in the refusal of consent for land adjacent to H61 as it would compromise the effective development of adjacent ground. The possibility of utilising an existing bridge over the railway to the west of this should be explored.

Lynn Grattage (0362)

Agree with all the proposals, however, in respect of WE5 a new bus lane will be required and an off road cycle lane.

#### NatureScot (0528)

There is a need to set out a plan and design-led approach to long-term growth of this part of the city. Since the adoption of the West Edinburgh Landscape Framework and Strategic Design Framework in 2010 the strategy for and nature of proposals in West Edinburgh have changed. In addition, the wider context for delivery has change significantly following declarations of climate and nature emergencies and a more pronounced shift to integrated planning and delivery. There is a need to ensure connectivity and accessibility through provision of sustainable travel improvements, including the delivery of active travel corridors that are currently weak and/or underdeveloped. The inter-relationship between sites in the wider West Edinburgh area are important, particularly how sites identified as 'West Edinburgh' in the Proposed Plan relate to each other to create a new 20 minute neighbourhood and also deliver functions for the other areas identified in paragraph 3.53 (page 71).

#### Murrayfield Community Council (0146)

We are concerned that the proposed measures will be insufficient to prevent a massive increase in traffic volume heading from West Edinburgh through Murrayfield into the City. Trams are better than buses at getting people out of cars. Public transport routes should be tram routes and the developers should be required to pay.

#### Grange/Prestonfield Community Council (0192)

Where proposals affect more than one transport mode, e.g. rail and bus, interchange between modes of travel including pedestrian must be facilitated.

#### Ratho and District Community Council (0289)

Infrastructure must be in place prior to the commencement of development and in particular improvements to the A8 and the Gogar Roundabout to meet the additional vehicular traffic including construction vehicles and buses as well as private cars.

#### Simon Hindshaw (0095)

WE27 is not justified.

#### Alasdair Gillies (0035)

I don't support WE6, this will make congestion (and pollution) significantly worse for those who can only travel by car. In relation to WE12 and WE16 it is a missed opportunity to extend to Cramond and reintroduce public transport to Edinburgh Park.

#### Spokes Lothian (0545)

As part of the West Edinburgh Transport Infrastructure Programme, there are proposals for; 'Intelligent traffic signals at Newbridge / Gogar / Marbury'. Whilst this package includes safeguards for active travel & public transport improvements that Spokes supports, it should be noted these should be prioritised and even be in place before the

improvements that benefit car users. The proposals for Eastfield Road will again induce more car based journeys to and from the airport and make public and active travel modes a less attractive alternative.

Hallam Land Management (0615), Tarmac (0244)

Neither the WETA or WETIP reports, on which the Council relies heavily within the Proposed Plan, assess or appraise the level of housing now being proposed. In fact, the original 2010 WETA assessment assumed very little housing at all. We consider that the vision is flawed and seeks to shoehorn residential development into a 'city extension' which will not be sustainable due to transport and associated capacity limitations. The concentration and density of uses in the A8 corridor is not demonstrably deliverable without further analysis, much of which is delegated to a future Masterplan, subsequent assessments and supplementary guidance. This should be presented and fully considered as part of the Proposed Plan before being considered any further.

Juniper Green and Baberton Mains Community Council (0306), Archie Clark (0003)

The IBG area is substantial and traffic from it will put enormous pressure on to the road system, with developments approved under LDP2016 and 'Land East of Millburn Tower' adding to congestion at the Gogar roundabout. A long-term detailed masterplan therefore needs to be prepared by CEC well in advance and the traffic plan modelling checked by an independent reputable university. This should indicate the extent of shopping/ commercial/ administrative/ education/ workplace/ recreation facilities (including full-sized football/rugby pitches) in H63. This entire area needs to be looked at as a New town, complete with sufficient workplaces and services for the entire community.

Accidents on the Gogar Roundabout would have immediate and far-reaching consequences on all the roads leading to it as well as the airport. An incident in this area (like a train becoming derailed) could result in major disruption over a wide area.

Areas H59-H62 need to be incorporated into the mix so that residents are not encouraged to resort to their own transport.

Paragraph. 3.224 states "Additional capacity on the road network for private car use is not supported". Would that apply to the Gogar roundabout? Acronyms should be avoided and definitions of WETA/WETIP, CPZ and City Deal should be provided as well as links to these documents. Clarification is required over the use of a colon in criterion t (a) of West Edinburgh Design Principles.

Cramond and Barnton Community Council (0243)

Not confident that the Council will deliver travel infrastructure, education and other services to scales and timing fully compliant with 'infrastructure first' principles, or that traffic assessments and management measures, including actions to deter commuting and reduce car mileages, will adequately mitigate the impacts on communities neighbouring the A90 and A8 roads into the City from the impacts of traffic generated by all West Edinburgh developments and current and future traffic flows from West Lothian and Fife.

Corstorphine Community Council (0799)

Corstorphine residents regularly experience the detrimental effects of people using the streets as a long-term park and ride when travelling to the airport. CCC would expect the West Edinburgh development area to also experience this behaviour. It may be worth expanding the West Edinburgh Design Framework criterion to include mitigation measures so that people do not attempt to garner free long-term car parking when going on their holidays. There are no references to accessibility and equalities as part of the West Edinburgh Design Principles. CCC would like to see inclusion of accessibility standards so that West Edinburgh is genuinely inclusive and accessible to all. This would include elements like fully lit active travel routes that are overlooked and not isolated, adequate disabled parking provisions that allow people with limited mobility to access amenities without impediment, and strict adherence to the Edinburgh Street Design Guidance, so that accessible design is inbuilt throughout. There are no references to air pollution or mitigation measures to tackle this issue as part of the West Edinburgh development. As this development is sandwiched between two existing AQMAs (St Johns Road and Glasgow Road) CCC is surprised that management and improvement of air quality is not mentioned as part of the Design Principles. This should be included, so that any development and planning actively works to reduce air pollution impacts. For example, elements like the avoidance of canyoning, the inclusion of green infrastructure and EV infrastructure to help reduce reliance on ICE vehicles.

#### Network Rail (0071)

It is considered that further infrastructure will be required at rail stations to accommodate a significant increase in additional journeys. This could include an increase in facilities such as footpath/cycle links, cycle lockers, bus turning areas, taxi ranks, electric bike charge points, ticket machines and waiting shelters. Whilst sustainable modes of transport will be the preferred approach to travel to the station, it is likely that some journeys will be by car and that in order to avoid on-street car parking issues in surrounding areas, the requirement for additional set down areas, car parking and electric car charging points need to be fully assessed. The West Edinburgh development should therefore demonstrate the impact of the proposed increase in different modes of travel to and from nearby stations and further discussions held with Network Rail and Scotrail to agree how this impact can be accommodated.

#### Anna Goodwin (0302)

Development must encourage tram, bicycle and bus use. The road network is already very busy at key times of the day. The A8 into the city from the west is often stationary and is known for its poor air quality, and there are also regular bottle necks in areas such as the routes into/out of South Gyle. Sufficient infrastructure must be available to support the proposals. There are already large new developments to west of Edinburgh taking place. Whilst I appreciate the need for new housing and associated supporting amenities, high quality, independent cumulative/in-combination air quality, noise, access and traffic assessments must be undertaken, and the mitigation must be well enforced. At the moment, the wording of the strategy commonly uses 'should' when referring to such requirements; this needs to be definitive and say 'must'.

#### Michael Ramsay (0011)

Support these proposals and assume that the master plan with traffic assessments and consideration of infrastructure will be available for the decision process.

Pawel Stankiewicz (0445)

Quieter and safer active routes are more attractive to use. In the case of square urban blocks, diagonal routes cut walking distance by up to 30%.

**INF 4: Provision of Transport Infrastructure.**

West Town Edinburgh Ltd (0660)

Generally supports the policy. However, request further clarity on the necessity to undertake cumulative transport assessment within an individual site specific transport assessment. It is considered that cumulative impacts have already been assessed as part of the supporting City Plan 2030 Transport Appraisal to determine the area wide transport interventions. Suggest that an individual site specific transport assessment would examine that individual's transport impacts on the local road network only, in accordance with established Governmental Transport Assessment Guidance.

Crosswind Developments Ltd (0184)

The approach set out in the policy goes beyond Transport Scotland's current Transport Assessment Guidelines, most notably in relation to 'cumulative transport impacts'. TAG requires committed development to be considered, whereas the policy seems to be more wide ranging and likely to require consideration of development within City Plan itself, irrespective of whether its consented or not. Generally supports this policy, however, request further clarity on the necessity to undertake cumulative transport assessment within an individual site specific transport assessment. It is considered that cumulative impacts have already been assessed as part of the supporting City Plan 2030 Transport Appraisal to determine the area wide transport interventions. We would therefore suggest that an individual site specific transport assessment would examine that individual site's transport impacts on the local road network only, in accordance with established Governmental Transport Assessment Guidance.

Edinburgh Airport Limited (0761)

The approach set out in the policy goes beyond Transport Scotland's current Transport Assessment Guidelines, most notably in relation to 'cumulative transport impacts'.

Homes for Scotland (0404), Wright PDL (0078), Barratt David Wilson Homes (0677)

In terms of transport requirements, it will be important that the Council avoids a situation where the delivery of early phases of large sites are stalled because all of the land required for the necessary/desired connections is not in the applicant's control.

Ratho and District Community Council (0289)

Infrastructure must be in place prior to development. Development creates additional traffic especially construction vehicles. Overcrowded roads and roundabouts need to be improved in advance to reduce the congestion of undertaking improvements when the traffic has increased.

## **INF 5- Location of Major Traffic Generating Development.**

### **Hallam Land Management (0615)**

Inf 5 is inconsistent as far as development is concerned. All of the major developments in the Proposed LDP will generate traffic to a greater or lesser extent with reliance on the private car. Not all of the proposed allocations are in accessible areas and these should not be supported in preference to locations such as Goodtrees Farm. The reliance on the private car should be defined / explained. There is no clarity on what is good accessibility or the impact of technological change on travel patterns up to 2030. Constraining development on the basis of car reliance is not reasonable or sustainable. The current wording is too restrictive and, in practice, unworkable. The reduction in car use over the plan period is predicated on public transport improvements and modal shift. This is not clear and bears little relationship to commuting patterns or the location of employment and commuting needs. Craigiehall has the potential to take advantage of its proximity to the A90 and influence modal shift through its strategic location thereby intercepting a percentage of trips into and out of the city, particularly from Kirkliston and Dalmeny which has a rail link.

### **Tarmac (0244)**

The use of the word 'reliance' implies an absolute need to use the car. There is always going to be a situation where a use is reliant on some people accessing it by private car. The current wording is too restrictive. Accessibility is a relative term, and it is not clear what constitutes 'very good accessibility'. Proposed development at Bairdview Ratho is not only providing new facilities and services in situ for the village but is also providing green travel routes and connections to avoid car use wherever possible. The level of accessibility to community facilities for the whole of the village will become very good through this development.

### **Steve Loomes (0767), Wright PDL (0078), Homes For Scotland (0404), Barratt David Wilson Homes (0677)**

Clarification is required as to what is considered to be a "significant" trip generating use. Contributions need to be fairly and reasonably related to what is proposed and must be necessary for the development to proceed.

### **Miller Homes Limited (0649), Hallam Land Management (0599)**

The policy does not specify what a significant travel demand is. It is inappropriate to have such an ambiguously worded policy within the development plan. Impacts of developments on the transport network and modes should be considered on a case-by-case basis in accord with the relevant national and regional guidance.

### **Avison Young for Aldi Stores Ltd (0526)**

The wording of the following is ambiguous and could be misinterpreted and taken out of context:

"Proposals for major development\* which would generate significant travel demand will

not be supported where there is a reliance on private car use.”

“Such uses will only be permitted on suitable sites with very good accessibility by sustainable transport.”

In addition to the ambiguity of the first sentence, the phrase ‘very good’ is a subjective term, open to interpretation and therefore inappropriate within policy language.

Living Streets Edinburgh Group (0486)

Strongly supports the Council’s unambiguous position and requests that it is reflected throughout the place and subject policies in the plan so that developers clearly understand what is expected. Request that “major” be removed otherwise there will be cumulative impacts of smaller developments or even developers breaking proposals into smaller parcels so they can argue for continuing car led developments.

Cockburn Association (0777)

Policy is supported, however, Clarification of what criteria will be used to determine ‘very good accessibility by sustainable transport’ is required.

Cynthia Shuken (0632)

You say "Proposals for major development\* which would generate significant travel demand will not be supported where there is a reliance on private car use." However, by your recent restrictions on parking and narrowing of roads throughout the city (thus reducing the number of bus stops) and, particularly, the introduction of swingeing parking charges downtown on Sundays significantly increases: longer trips to out-of town shopping areas with large amounts of free parking; pollution from cars due to the slower through-put of traffic. It also mitigates against your Inf 1 and Inf 2 aims, as people increasingly use shops, leisure facilities, etc, that are located in out-of-town areas. This, in turn, kills off city-centre businesses, further resulting to more traffic and business going out-of-town. Some people may be encouraged to walk or cycle rather than use cars, but for many people this is not an option. In fact, this policy could, with some justification, result in indirect discrimination, as many older or disabled people, and many of those with young children, cannot cycle or walk long distances, and only the very fit can do so, especially when shopping and needing to carry large packages.

The reduction in bus stops resulting from the recent proliferation of cycle lane barriers further disadvantages people in these categories. Additionally, these barriers are dangerous, causing accidents with people tripping over them while watching the traffic to cross the road in shopping areas. I would like to see all of these physical barriers reduced, Sunday free parking downtown reinstated, and bus stops increased.

**INF 11: Public Transport Proposals and Safeguards, Table 6, Table 7 & Table 10**

Hallam Land Management (0615).

Public transport strategy and detailed improvements are not evident through the LDP. The implications of public transport proposals are not included within this part of the city and it is not clear if any will ‘come forward’.

There may be a case where development can facilitate improvement to existing service provision, for example. In a location such as Craigiehall a housing development could introduce new bus stops on existing routes, or influence bus routes for example along the Burnshot Road to Kirkliston. Development could facilitate a new Park and Ride, for example, such as is proposed at Craigiehall. The 'Edinburgh Strategic Sustainable Transport Study, Regional Transport Strategy and Strategic Transport Projects Review 2' are not available for consultation as part of the LDP which is reliant on these assessments. The LDP is not integrated in this respect and substantive comment is difficult in these circumstances.

Bo Adams (0363)

The positioning of bus stops around Kaimes Junction and Frogston road need to be looked at, they create congestion, and in some ways are not accessible for disabled or parents with prams and are dangerous for kids to cross the road.

National Galleries of Scotland (0725)

The Proposals Map includes a proposed safeguarded active travel route (ref. ATPR46) through The Art Works, Granton site. NGS welcomes the acknowledgement within the Policy that the routes shown are indicative, recognising that the exact configuration should be developed during the planning application process taking cognisance of local site conditions and constraints. The Proposed Plan should also explicitly acknowledge that in order to deliver some of the safeguarded active travel routes, the Council may need to use its Compulsory Purchase Order (CPO) powers.

Tarmac (0244)

There may be a case where development can facilitate improvement to existing service provision, for example. In a rural location a new housing development could introduce new bus stops on existing routes, or influence bus routes. A development could contribute financially to continue or provide a rural bus service. Bairdview will increase potential patronage making existing supported services more viable.

Simon Hindshaw (0095)

This section lacks credibility in terms of the improvements that will be necessary if the city is to meet its sustainability objectives. The Council has a track record in removing bus priority measures in favour of cyclists. A fleet of electric buses and the same on street priority measures as would be needed for a tram, most of the benefits could be delivered for a fraction of the cost. This is shaping up to be a scandalous waste of public money on a vanity project.

Louise Baker (0773)

The importance of peripheral connectivity within the city requires greater consideration. Much of the public transportation in the city requires a journey into the city centre to then access another peripheral area. This could be combated by bus route provision or by the development of resources such as the South Edinburgh Railway. While the city presently has good bus provision, it is expensive. Better integration of bus services and also bus



with tram services would be beneficial.

Juniper Green & Baberton Mains Community Council, (0306), Archie Clark) (0003)

Section 3.212 states, “Phase 2 of the study continues to build a strategic business case for two mass rapid transit routes for the city.” But gives no further detail.

A clear route map should show all the Orbital Bus routes. Bus routes inside the City Bypass will not be rapid as buses will be subject to local 20mph speed limits. Routes should be continuous (and not broken at the Musselburgh end) so that people do not have to change buses. It would be an encouraging step to match it with an express bus connecting the P&Rs along the route using the Outer City Bypass.

Archie Clark (0003)

‘Transport Proposals and Safeguards’ – There needs to be some data to justify the proposals – these were not available for ATSR6 – the West Edinburgh Link – in the Plan or in “Appendix 5 – The Transport Appraisal Technical Note”. Where can this information be found?

“Appendix 5 – The Transport Appraisal Technical Note” – The drawings in this section when read alongside area plans in Appendix 2 are difficult to interpret and may be providing conflicting information. Tracing the route of ATSR6 is a case in point.

Trams are enormously costly, are inflexible and use up a lot of road space that requires specialised maintenance. Buses are cheaper to run and when an incident occurs when the line needs closure, they can be diverted along nearby routes. The area of the City they cover is negligible. If the trams had been undergrounded (as in London and Glasgow) these issues would not have been so significant and the trams could run faster. The monies saved by not bring trams back could be transferred into creating meaningful 20-minute neighbourhoods with core facilities.

The former railway tunnel (Scotland Street Tunnel) (See supporting document Clark, Archie) should be utilised as a pedestrian traveller to link Waverley Station to a tram/bus stop in St Andrews Square. That would have the benefit of linking heavy rail, tram lines, distant and local bus services together. In relation to Table 10. Linking Waverley Station to a tram/bus stop in St. Andrew Square using the former railway tunnel for a pedestrian traveller.– something that is currently lacking where it is most needed.

Robert Drysdale (0354)

Support the principles set out in policy Inf 11 but wishes changes to the proposals and safeguards listed in Part 4. Also supports the strategy in all aspects apart from the transport aspects, specifically maps 1 and 2. The plan maps should be altered as per my diagram 1 (Proposed Changes to Spatial Strategy). (See my Supporting Document: Drysdale, Robert)

Routes TR1 and TR2 are already approved by Parliament (Tram Line 1 Act 2006) and is mostly off-road on former railway. This route was originally supported by the council’s consultants Jacobs Steer as being preferable to any street-running alternative. Their

later decision to consider a street-running alternative (TR3 – safeguarding option B2) appears to have been based largely on two false assumptions: (1) that bridges on the TR2 former railway route would require reconstruction to accommodate a footpath / cycleway alongside the tram line; and (2) there would be greater penetration into potential passenger market using an on-street route. Short sections of single-track tramline under/over bridges would be operationally straightforward. Tram stops are relatively infrequent compared with bus stops, and only three tram stops are envisaged between Crewe Toll and the city centre on the on-street route, so penetration into a larger passenger market is unlikely.

Comments about wildlife made during the parliamentary inquiry into the TR2 proposal in 2005 were thoroughly examined and debated but were considered insufficient to outweigh the benefits to be gained from the tram following this route. Tr3 would likely suffer from slow speeds and congestion unlike Tr2. Option B2 (TR3) was not mentioned in the Main Issues Report. Paragraph 80 of Circular 6/2013 on Development Planning makes clear that a proposed plan should not introduce new or controversial elements which were not aired in the preceding Main Issues Report; TR3 represents a major change.

#### University of Edinburgh (0464)

Supportive of the tramline being accessible to all parts of the University of Edinburgh campus and welcome the existing safeguard, along with proposed new safeguard options. However, careful consideration is required to achieve a suitable balance of public transport infrastructure with the unique character of Edinburgh City Centre and to balance this with key areas of public realm and movement / connectivity, especially where tram infrastructure could introduce unwelcome impacts or barriers to permeability. If any safeguard options impact upon the landownership of the University of Edinburgh estate, further dialogue is requested. TR6 Nicolson Square / Bioquarter route) The University of Edinburgh support retention of this safeguard and detailed consideration of the business case to progress towards implementation.

#### Cramond & Barnton Community Council (0243)

PT6 should be extended at least to Barnton, or preferably to Cramond, to provide links to The Gyle, Gateway Station and indirectly to the Airport.

#### Friends of Cammo (0387)

Support the orbital bus route but note that Spatial Strategy Maps 1 and 2 are inconsistent on the route taken near Maybury junction.

#### NatureScot (0528)

Generally welcome the proposals for the North and South Orbital. However, consider that these proposals should have more explicit links with active travel routes, proposals and safeguards which would make a modal shift, including changing mode during a trip, more feasible for most residents.

#### Mrs Patricia Scott (0349)

In relation to route PT6 more connections between the “villages” of Edinburgh are needed. Proposals for the New Eye Pavilion at Livingston and Care Homes are not at present addressed by existing bus routes. The proposed route should be extended at least to Barnton and Cramond to provide a link from Cramond to the Gyle, Gateway Station and the airport.

Inverdunning (Hatton Mains) Ltd. (0427)

An A71 Corridor Express Route/Rapid Bus Transit (Livingston South to City Centre) should be added to table 6 to reflect proposed Hatton Village allocation as set out in Supporting Document. Map 8 (Transport Proposals and Safeguards) – add line on A71 noting Public Transport Proposal – Bus Improvements, reflecting same route as identified Strategic Active Travel project.

Alasdair Gillies (0035)

Pt6 is a missed opportunity to strengthen and reintroduce public transport from Cramond to Edinburgh Park.

The Davidson’s Mains and Silverknowes Association (0454)

Supportive of improvements to bus services to enhance orbital bus services round the north west of the city. These should be further enhanced to provide better connections between local communities and main shopping centres. Examples are improved direct links between Cramond and Davidson’s Mains and between Davidson’s Mains and Stockbridge. The transport hub at Ingliston should be fully developed as an intermodal interchange for all transport links and linked into orbital bus service routes.

Ratho and District Community Council (0289)

Support the policy but the Orbital Bus Route should commence operation as soon as any houses/businesses open to relieve congestion on A8

Jean Morley (0461)

The orbital bus route would be vital and would benefit the elderly in the city. Cramond to the Gyle and the Airport should be a link that is introduced via Maybury Road.

Lynn Grattage (0362)

Supports the orbital bus route, especially since it seems to go to Edinburgh Royal Infirmary. However at least one more orbital bus route is required which goes between this and the more central ones. Ideally further consultation and discussion with Lothian buses should be carried out about where people live and work to finalise routes.

Lady Road Investment S.A.R.L. (0625)

Supportive of the safeguarded tramline (TR6) route being accessible to Cameron Toll. There is a concern however, that with the uncertainty of the exact route or without an indication of delivery, this could impact upon development options at Cameron Toll, and

their timescales for coming forward.

Miller Homes Limited and Wheatlands Farming Partnership (0592)

Supports the inclusion of the safeguarded options for the extension of the tram route in Table 7, however, objects to the failure of the Council to identify an extension of the tram route between the settlements of Newbridge and Kirkliston within Table 7 of the Proposed LDP. This extension would support the existing safeguard of the tram route between the Airport to Newbridge (Reference: TR10). The safeguarding for the extension of the tram route to Kirkliston will also support the proposal for the delivery of a housing and mixed use development promoted by Miller Homes on land at Kirkliston East.

Supports the route of the safeguard for the Almond Chord which runs along the northern boundary of the site promoted by Miller Homes and the Wheatlands Farming Partnership for a housing and mixed use development on land at Kirkliston East. However, there is a requirement to also safeguard the location of a new rail station to serve the existing settlement of Kirkliston. The delivery of a new train station will provide a significant transport intervention which will significantly improve existing public transport facilities in Kirkliston and connectivity to Edinburgh, Glasgow and the wider central Scotland rail network.

Alan Stevens (0646), B Hyland (0792), Sustrans (0561), Alistair Mackintosh (0650), C van der Dussen (0558), Claire Graf (0541), Connie Longmate (0707), Hannah Knechtli, (0259), Jakub Szwedowicz (0547), Joseph Coulson (0017), Katarzyna Wozniak (0546), Jordan Thomson (0676), Kasper Schwartz (0576), Fraser Wilson (0536), Despoina Papadopoulou (0575), Hannah Coulson (0331), Mark Beaumont (0752), Peter Moonlight (0550), Sandra Labinjoh (0690), Sophia Lycouris (0667), Graham Jones (0340), Mattia Ventre (0763), Catherine Labinjoh (0711), Andrew Longmate (0705), Heather Duque (0746), Patrick Longmate (0708), Gareth Wheeler (0636), Katherine Kennedy (0569), Heather R Finnegan (0664), Zuleika Connolly-Jones (0656), James McMeekin (0631)

Object to Tr2 Safeguard option B1b.

Alan Stevens (0646)

Tr 2 Option B1b, will stop people being able to get away from mechanised transport on busy roads. There must be alternatives to use existing roads to route trams if the strategy is to make it a city where there is no need for cars to get about.

B Hyland (0792)

Tr 2 Option B1b, would make the route unsafe for cyclists. It would cause noise. It would harm a natural space. It would impact on wildlife.

Sustrans (0561)

Need more detail on the proposals, to ensure that this popular active travel route is not adversely affected as a result of the proposed trams development

Alistair Mackintosh (0650)

The Council should look for on road options for trams.

C van der Dussen (0558)

This is an important traffic route for sustainable traffic and a valuable piece of natural environment in the city. A tramline would disturb and partly destroy an important natural part of our beautiful city.

Claire Graf (0541),

Preserving walking paths is essential for public mental health

Hannah Knechtli (0259)

Tr 2 Option B1b would be a loss of a vital and busy urban green space. It is also a benefit for walkers and their mental health. It would be detrimental to the character of the area and noisy. The expansions of trams is unnecessary and expensive.

Jakub Szwedowicz (0547)

The damage to the local green spaces in Ferry Road far outweighs the benefits to public transport provided by the tramway extension.

Joseph Coulson (0017)

There are perfectly good alternative routes, it would result in the destruction of key habitats, the removal of one of the only green quiet traffic free routes we have, the destruction of key areas of woodland, and the severe degradation of a critical cycling & walking link on which thousands of people depend for a few moments of fresh air and breathing space.

Katarzyna Wozniak (0546)

Roseburn path is an amazing place to cycle and walk away from the traffic. The tram should go by the main road.

Jordan Thomson (0676)

TR2 Safeguard option B1b is one of the only green traffic-free routes we have in the city. It would make the city less green and less clean

Kasper Schwartz (0576)

Safeguard option TR2 B1b will undoubtedly have great detrimental impact on the active travel and recreational qualities of the Roseburn path, as well as the established vegetation and biodiversity it holds. Instead, the council should use the new safeguard option B2 (TR3) if and when it looks to expand the tram network in this area of the city.

Fraser Wilson (0536)

There are already bus links which serve the areas covered by TR2 B1b so it will not benefit the city as the people who would take the tram on this route are already on buses. Taking away the cycle path will lead to more congestion on roads as cyclists will be forced to move onto the roads. It will not create a greener city as some cyclists will give up on the bike and return to their cars as they do not feel safe or feel uncomfortable cycling on busy roads.

Hannah Coulson (0331)

Safeguard option TR2 B1b would destroy this traffic-free, nature-filled space. This path is already part of important infrastructure – it is a National Cycle Route. It used by thousands of people already as they cycle and walk to work, school etc. It is also full of wildlife and trees which would be severely impacted by this work.

Mark Beaumont (0752)

The Roseburn path is an important green space and important active travel corridor. Running the tram down the road would be the preferred option.

Peter Moonlight (0550)

Green transport links between north Edinburgh and west Edinburgh are extremely rare. While I fully support Edinburgh having a well developed tram network, this should not come at the cost of existing, well-used green transport networks.

Sandra Labinjoh (0690)

TR2 B1b degrades a key section of national cycle route 1. This is an important, well used, environmental corridor in Edinburgh and a green amenity space.

Catherine Labinjoh (0711), Andrew Longmate (0705), Patrick Longmate (0708)

Tr 2 Option B1b would result in loss of green space, loss of the traffic free cycle path, changes to historic bridges along the route, increased noise for residents in a quiet area, increased light pollution, potentially damage properties along the route and cause loss of their value and harm wildlife and trees. There is insufficient evidence of the utility of the tram in this area which is well-served by a cycle path and buses. This proposal disproportionately impacts communities which are unlikely to use the tram but which benefit greatly from access to green space. It would harm an area of outstanding character. The Council should consider existing infrastructure routes, which complies with the council's own stated aim of: adopting an 'infrastructure first approach, directing new development to where there is existing infrastructure.

Connie Longmate (0707)

Tr 2 Option B1b would result in loss of green space, loss of the cycle path, change to historic bridges along the route, increase noise for residents, increase light pollution, potentially damage properties along the route and cause loss of value, harm wildlife and trees. Any extension of public transport should aim to displace high carbon modes of transport (like cars) not cycle paths.

Heather Duque (0746)

Roseburn walking and cycling path is quiet and leafy and promote wildlife, healthy living, quiet and peace. This kind of “progress” isn’t really the kind of thing that makes cities better for residents... or more attractive for people living in the neighbourhood.

Sophia Lycouris (0667)

Do not destroy the Roseburn Path to use for any new tram lines. There needs to be good walking space in a city, not just transport lines taking people from home to work and back, as if all people have to do in life is to work.

Graham Jones (0340)

The cycle paths should not be seen as only a transport route, it should also be viewed as part of the social fabric of the city that reaches throughout the city benefiting a diverse range of socio and economic communities. The importance of these social green pathways which are accessible to all is incredibly valuable to the healthy life of a modern city. The Roseburn cycle path, like so many of the cycle paths in Edinburgh, provides an alternative transport (cycling and walking) network that avoids hazardous and polluted roads. Due to Covid, we can expect a reduction in commuting traffic between home and workplace and the need for spaces where people can cycle, walk and exercise safely will increase. This type of organic urban rejuvenation should be celebrated and cultivated not destroyed for a single mode of transport.

Gareth Wheeler (0636)

Roseburn path is an excellent active travel asset for the city of Edinburgh.

Katherine Kennedy (0569)

Referring to TR2 B1b – The Roseburn path is a traffic free walking, cycling and wheeling route and should remain as such. If the trams are to be extended, take some road space from Ferry Road, not from an essential active travel route.

Heather R Finnegan (0664)

Do not support a tram being built on or around Roseburn Path. I prefer the preservation of green spaces in our city to noisy construction and tram lines.

Zuleika Connolly-Jones (0656)

Do not wish Roseburn path to be built over/used as a tramline. It is a space of nature where many people exercise, walk and be in nature in the city, which is invaluable for our mental health, especially with the recent lockdowns. Is this proposal for the people who live here or is it to bring up the house prices by minimising the travel time to the city centre and therefore bring more money to the city?

James McMeekin (0631)

This cycle/running/walking path is a vital part of the city's infrastructure and losing it would be a significant loss and set a worrying precedent for removing or reducing human powered connections in the city. This network is one of the few areas where people can travel a significant way without having to avoid cars and buses. It is also an under-recognised wildlife corridor within the city.

John Yellowlees (0024)

The Council seem to be seeking to undermine tram route (TR2) by introducing a new Safeguarding Option B2 (TR3). Trams are about providing fast transport to outer suburbs. By diverting the Granton route onto this new on street option, you would be lengthening journey-times while increasing the cost and timescale for construction and also missing out Haymarket, now one of the city's most important interchanges. The Roseburn Railway Path could run alongside the Tram – as the Airdrie-Bathgate path does alongside the railway that reopened in 2010. Public transport is for everyone, whereas active travel is for those (i.e. most but by no means all of us) who are able to participate. Option B2 would be to the detriment of public transport users.

John Watt (0321)

Support extending the tram network to the ERI and Bioquarter and then to Shawfair. However, this needs to be tied into a Park and Ride facility. Congestion charge or other model to reduce car access to the city centre and improve active travel modes should be considered. Extending network to Newbridge through the proposed new business district and creating new Park and Ride facilities at a Newbridge terminus together with disincentives to drive into the city should be progressed as speedily as possible.

Shawfair LLP (0258)

The tram safeguarded route shown in Maps 1 and 2 over the settlement of Shawfair requires to be amended. The route shown on this plan does not fit within the approved masterplan for the new settlement of Shawfair as it dissects several development plots, including brand new completed housing such as the Dandara plot which is almost complete. People will soon be moving into these homes.

Capital Rail Action Group (0789)

TR3 is an inferior option to TR2 as it misses Haymarket and will have slower running speeds due to congestion. TR4 would be very difficult to develop and would also be hugely disruptive to the life of the city for several years. Welcome proposals PTSG 1,2 and 3. However, changes to the routes and connections are suggested.

Spokes Lothian (0545)

Supports further investigation into the options of an on-road tram route as seen in 'Tram route safeguard TR1-11' or using the historic railway corridor. Understand that use of the former rail corridor would include a high quality active travel route (Active Freeway) alongside the tram. However this is not stated in the draft plan, and it must be made 100% explicit, together with an indication of what 'high quality' would mean. Major advantage of using the rail route for the tram would be to bring movement and light



to the path, together with external on-tram & tram stop CCTV, making the path far safer and more attractive. A road route for the tram could very likely rule out in perpetuity the prospect of segregated cycling provision on a major road artery into the city centre, and would mean a designed-in conflict with cyclists and tramlines on the narrow Dean Bridge. The road route could be significantly slower for the tram, reducing its potential to cut car use. Roseburn route is a very valuable quiet area and nature corridor, every effort must be made to preserve the nature corridor aspects. The reopening of stations on the South Suburban railway line would provide greater access to rail by bike as well as reduce car dependency in areas to the west, south and east of Edinburgh.

Peter Brown (0672)

The south suburban railway and stations should not only be safeguarded but be reopened to passenger traffic as it addresses connectivity and carbon emission objectives. Other closed railway lines should also be safeguarded for future reopening

Suzanne McIntosh (0409)

City Plan 2030 is an opportunity to look to the re-opening of the south sub-urban rail network in the city to assist active travel. Provision should be made for this in the plan.

Theo Spanellis (0415)

The only part I do not agree with is the South Suburban halts. There are ways to provide a suburban train service that will be quiet and of adequate speed allowing the existing train lines to be reused. A train service can link the southside quickly to the train hub at Haymarket, avoiding all the traffic of Lothian Road, and also helping to relieve that traffic, and provide an environmentally friendly solution to quick transport to and from the city centre.

Robert Falcon (0640)

Supports all the PTSG safeguards. However, there appears to be no detail on the infrastructure or other developments required to make these happen, in particular the reopening of Portobello – Piershill – Abbeyhill and associated rail stations will require road and wider infrastructure improvements, and for example consideration of diversions to bus routes.

Mr Cuchulainn Gent (0047)

Generally supports the plan, but I don't think it is very ambitious, nor will it make much of a difference in the next 10 years. Good to see active travel improvements, but this needs to be integrated with the very fabric of street design. I am unsure if the council has the expertise or capability to create appropriate active travel infrastructure. Fully support the protection of the train halts but it needs to be utilised. Edinburgh is poorly connected with respect to local rail and it has made no appropriate consideration as to how it would implement such infrastructure. The Jakob Steel report was very poorly done and did not seem to consider alternative uses for existing rail infrastructure. New rail stations and active travel interchanges should be introduced. Existing lines need to be upgraded. The South Suburban Line should also be opened and utilised.

Peter Allen (0336)

Supports the policy, but states that we need to protect every possible route for future public transport / cycle-wheel-walking paths, so that development does not preclude reactivation of any currently disused routes. Potentially possible to link the Tram system from Leith to Portobello using the old rail tracks that still exist at Seafield, and the old route that runs past industrial units below Seafield Road. If PTSG2 does not cover this possibility it should be added as another Safeguard

Grange/Prestonfield Community Council (0192)

The plan should review the feasibility of re-opening the South Suburban line to passengers and review safeguarding halts at Cameron Toll in relation to plans to redevelop site 21/06125/PAN (Proposed redevelopment of Cameron Toll neighbourhood centre, to include residential and hotel uses along with improvements to public realm and improved pedestrian, cyclist routes within the site and associated landscaping) & traffic impacts and suggested additional Place Proposal.

Transport Scotland (0480)

Recommends the rail stations detailed within Table 10 p178 – Public Transport – Other Safeguards under PTSG 2 and PTSG 3 are removed as they have not been the subject of an evidenced based appraisal such as a DPMTAG based appraisal in line with Scottish Transport Appraisal Guidance (STAG) and they have not been discussed or agreed with Transport Scotland as detailed within SPP. Furthermore, the Proposed Plan does not provide any information on funding, delivery mechanisms or timescales for the stations in accordance with SPP. The importance of providing this information upfront is reinforced by the Infrastructure First approach within the draft National Planning Framework. Early engagement on their inclusion and clarity on their need and delivery has not been undertaken or provided. It is not understood why they are required, for example, what specific transport problems they are addressing or how they would benefit communities.

Mike Richardson (0109)

The orbital bus route in Map 1 should be complete and continuous - it appears to be shown with a break in the Newcraighall area. It should be possible to travel around the orbital route in either direction without interruption.

Miller Homes Limited. (0256)

No justification has been provided to exclude the transit corridor towards the west of Hermiston, which was previously recommended for further consideration in the Edinburgh Strategic Sustainable Transport Study – Phase 1 (October 2019). Whilst it is noted that the spatial strategy provides a 10 year vision for the city, it is also noted that it has taken a significantly longer period to deliver the existing tram routes in Edinburgh, which is why any longer-term vision for a transit corridor to the west of Hermiston should be included in the City Plan now, and not wait until a further review of the plan. Riccarton Village can also assist with the longer-term vision of the transit corridor towards the west of Hermiston by creating a critical mass in this area and delivering a transport hub including a park and

ride.

**INF 13: Road Network Infrastructure, Table 9.**

Edinburgh Airport Limited (0761)

EAL wish to object to Policy Inf 13 on the grounds it references new transport infrastructure and junction improvements listed in Part 4 and shown indicatively on the Proposals Map however the Proposals Map does not align with the requirements of WETA Refresh 2016 or indeed the listed transportation improvements in Part 4 of the proposed City Plan.

Bo Adams (0363)

Kaimes Junction, Burdiehouse , Frogston , Captains and Liberton roads should all be closed for some time and redesigned fully to allow for the shift onto more active provisions and to get around with family on bike safely. No active infra at all, need direct safe routes on Captains, Burdiehouse , Frogston and Liberton roads, all main roads that are dangerous to use as a family or disabled person. There needs to be focus on noise reduction around bypass, noise absorbing asphalt combined with noise cancelling panels should be used along the bypass.

Corstorphine Community Council (0799)

CEC does not support the introduction of road infrastructure that creates additional capacity for private cars. Paragraph 3.214 should be amended to state that any proposed infrastructure changes should also support and prioritise sustainable transport, including public transport and protected on-road cycle provision.

West Town Edinburgh Ltd (0660)

Generally supportive, subject to the ability of large scale development to provide a permeable network of access points for all modes of travel to ensure a legible network that maximises use of existing infrastructure, whilst prioritising sustainable travel modes over private car use. The access strategy of these large scale developments, such as H63, is most appropriately developed through the site specific masterplan-led process.

Spokes Lothian (0545)

Without details this policy appears to be car focused and not prioritising active travel. Prefer to see junctions citywide being retrospectively improved to embody the transport hierarchy, prioritised for safety and VisionZero design principles. The grade separation of Sheriffhall Roundabout will provide significantly increased capacity for movements between areas north and south of the City Bypass. It seems completely contradictory for the ambition of Edinburgh being a city “where no one needs to own a car to get around. Although Sheriffhall is to be funded by the City Deal, the Deal can be modified. Glasgow City-Region Deal is being revised at the request of East Renfrewshire Council, to delete a major planned link road from the Deal and replace it by a new rail station, Country Park improvements and some smaller road upgrades.

Miller Homes Limited and Wheatlands Farming Partnership (0592)

Table 9 of the Proposed LDP does not identify the creation of a new loop road around the east of the existing settlement of Kirkliston. The delivery of this new loop road forms part of the proposal for a housing and mixed use development submitted by Miller Homes Limited (Miller Homes) as part of this consultation process. The delivery of the proposed loop road will improve road safety and provide relief from the existing traffic issues in Kirkliston by diverting traffic away from the centre of the settlement.

Mrs Patricia Scott (0349)

With traffic flow on the A90 at the Barnton Junction frequently at unsustainable high levels, proposals to adjust the phasing or otherwise of the traffic lights (R8) will do little to alleviate existing and major problems associated with the design of the junction itself nor projected greatly increased traffic volume. Additionally, further bus lanes will inevitably lead to an exacerbation of an increasingly time consuming delays.

Mr John G. Skinner (0065)

The action (R8) in table 9 is underwhelming with reference to the existing traffic at peak times.

Leonard Wallace (0314)

The term "Increase efficiency of signals." (In respect to action R8 in table 9) is to a degree vague. More specification of the proposed changes is required. Improvements to the efficiency of the Barnton Junction must necessarily include the needs of all users of the junction and all those who have an interest in the safe and efficient operation of this junction. Additional suggested road improvement measures are indicated.

Forth Ports Limited (0496)

Supports R1, but notes that the route crosses the operational port estate.

The Davidson's Mains and Silverknowes Association (0454)

Re-phasing of the traffic signals to improve traffic flows (R8) is a minimalist and inadequate response to traffic queuing and congestion at the junction. The junction needs to be completely re-modelled to give priority to public transport.

Network Rail (0071)

Generally supports the proposed new street in Leith Docks (R1) and the potential to create new development plots as part of the delivery project. However, access into this area is taken from Seafield Road at the junction with Marine Esplanade where there is an existing level crossing. Seafield Level Crossing is located at this junction. This is a Public Highway Manually Controlled Gate and has a high-risk rating in terms of public safety.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

The Dalmahoy Road junction on the A71 should be included in Table 9. It is long overdue for pedestrian and signal upgrades despite funds being collected from developers. This should be a priority if the work has not been completed before the finalisation of this Plan.

Archie Clark (0003)

Monies have been collected from developers to install a MOVA system to improve traffic flows at the very busy Gillespie Crossroads junction on Lanark Road. This work should be included in the Plan with a timescale. What emissions are being created along Lanark Road at Gillespie Crossroads, the centre of Juniper Green, Blinkbonny Road/Lanark Road West and any narrowed parts of the road – e.g. Bridge Road/Lanark Road West in Balerno?. Recent temporary traffic light installations (an almost daily feature on this road) make the present level of pollution more obvious. Promoting ‘maximum parking limits’ will create problems for those areas where cars are needed as people will pavement park or park indiscriminately and an understrength police force cannot regulate that.

Jean Morley (0461)

Changes to the lights from Cramond Brig to Craigleith (R8) must reflect the safety of residents on both sides of the road to get in and out of their drives safely.

Cramond & Barnton Community Council (0243)

Support in principle R8, however this will not resolve current congestion issues. While there is a current redesign study for Maybury Road and Barnton Junction (Jacobs) focusing on active travel improvements a more holistic approach to traffic management on the A90 corridor from South Queensferry to the West End, Maybury Road and its approach from Gogar, and routes in North West Edinburgh used for ‘rat-running’ (e.g. Whitehouse Road to Cramond Road South, Drumbrae, Clermiston Road, Burnshot Road) is required. The Queensferry Road corridor between Craigleith and Barnton should be designated as an Air Quality Management Area as serious air quality issues in the vicinity of Barnton Junction will inevitably increase with new developments in West Edinburgh, West Lothian and Fife.

Gavin Cameron) (0782)

I don’t believe the signal efficiency is the issue at Barnton. (R8) The council changed the status of the land they had been bequeathed at Cammo / Maybury from green belt and then sold it. Circa 600 houses are now being built and the council stated this was a national road issue and not a local decision.

SEPA. (0012)

Support the policy, however ask for careful consideration of those parts of these proposals which may act against the aims of Edinburgh achieving its targets for net zero by simply enabling further use of the private car.

**INF 14: Rail Freight**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Consider that Edinburgh's current under-utilised rail network could be engaged in development of a fast and sustainable passenger transport network, or goods distribution network – even if only to the freight distribution hubs as visualised in section 3.245 on page 137.

Forth Ports Limited (0496)

Delete the second sentence of paragraph 3.215, which reads “Keeping a reduced general freight rail head to the east in Seafeld will complement the safeguard for a waste management facility in that location (see Policy Inf 18).” There is no justification provided for the safeguarding of a waste management facility at Seafeld.

**Modifications sought by those submitting representations:**

**Transport Strategy and General Comments**

Cramond and Barnton Community Council (0243)

The sole emphasis of the 'Outcome': 'A City where you do not need to own a car to move around' (p.15, para;2.36; p.30) should be extended to cover other key outcomes mentioned in the text, including education and healthcare, which should also be priorities for the City. It should be refocused to more positively state -

'A city where people enjoy high quality and readily accessible sustainable travel facilities (e.g. bus, tram, active travel), educational provision and healthcare services'.

The energy and waste statements within this 'Outcome' should be transferred to the first 'Outcome', which focuses on 'a sustainable City ...'.

Homes for Scotland (0404), Wright PDL (0078), Steve Loomes (0767)

No modification specified but it is indicated that the plan policies will stop the city achieving them the aim. Concerned that the displacement of businesses may lead to an increase in car dependence for some, as these businesses may well relocate to more peripheral areas, increasing the need for work trips by car. Object to the fact the Council does not appear to have properly considered this.

It requires to be established that the sites allocated are inherently more accessible via public transport/active travel options than non-allocated sites.

Living Streets Edinburgh Group (0486)

2.118 has to be reinforced as follows “To help achieve the sustainable mode share targets and deliver in line with the sustainable transport hierarchy, we require all development:...”

2.119 is not strong enough Its about more than “taking opportunities”....development "must enhance" etc...

Reference to the Transport Hierarchy as set out in Scottish Planning Policy and the National Transport Strategy and the priority given to walking within the hierarchy should be included in the City Plan 2030 aims (p8) A categorical statement should be made that the

Council is moving away from an assumption in favour of private car use, break down active travel to make clear walking & cycling, and state that provision is within developments as well as linking neighbourhoods.

Aim 8 should refer to enhanced or new pedestrian infrastructure to help deliver the transport hierarchy.

The plan should make it clear that the Transport hierarchy has been in Scottish Planning Policy (and Designing Streets) for some time and is therefore established planning policy.

Paragraph 2.30 which refers to City Mobility Plan and the transport hierarchy, it should have a stronger statement reinforcing walking is the top priority. Place Briefs should have specific reference in all of them to the Transport Hierarchy and the priority afforded to walking.

The grids used in Appendix D should have a separate column for delivery of pedestrian priority in accordance with the transport hierarchy.

The Glossary should offer a definition for walking and its priority within the Transport Hierarchy.

Gavin Cameron) (0782)

No modification specified but it is indicated that Cramond does not have equal access to public transport across the city and has never been invested.

Archie Clark (0003)

No modification specified but it is indicated that it will be difficult to see a reduction of traffic and traffic-borne air pollution and have ideas like LEZ's, mobility hubs, smart electric vehicle charging have been investigated and proved to be workable? Does not support LEZ. Reduction in car use will not be achieved.

Robert Drysdale (0354)

The plan maps should be altered as per my diagram 1 (Proposed Changes to Spatial Strategy). (See Supporting document Drysdale, Robert ANON-CUYN-2RUU-D)

The reference to 'A city where you don't need to own a car to move around' should be replaced with 'A city where you don't need to use a car in order to move around quickly and efficiently'.

In addition, I wish to see the following paragraph added after paragraph 2.114 on page 30: "Currently there are only limited opportunities available for passenger rail travel within the city, but those journeys which are possible are very rapid, for example from the ten railway stations located within the city boundary to Haymarket and Waverley stations in the city centre, and most rail services serving these stations operate frequently. The council will continue to liaise with Transport Scotland and train operators to explore ways in which greater use can be made of the city's rail network in terms of new stations and additional services, possibly also using tram-trains linking in with the tram network. The safeguards in Part 4, Table 10, reflect this".

A further requirement should also be added to this policy, cross referenced to policy Inf 4, relating to the safeguarding of former railway lines as they were under the Structure Plan and City Local Plan.

Crosswind Developments Ltd (0184)

Map 8 should be modified to be consistent with Map 1 and the ERRATTA It should show active travel routes in West Edinburgh and how these routes join up or connect from significant starting points to significant destinations. Map 8 should be labelled, have a policy reference and be clearer.

Leith Central Community Council (0614)

No modification specified but it is indicated that the rationale behind the 20% reduction in car kilometres should be explained. It is also indicated that electric vehicle charging facilities are not properly accounted for. They should be encouraged for e-bikes and for shared or non-private car use.

Frances Guy (0589)

At paragraph 2.30 provide more ambitious target for reducing car use to 40%.

Hallam Land Management (0615)

Update paragraph 2.17 in relation to the Strategic Transport Projects Review 2. No further specific modification proposed but it is indicated that reference to the City Mobility Plan and associated strategic transport impacts related to the spatial strategy need to be more explicit. The Mobility Plan needs to reference post-Covid travel patterns and the need for economic resilience. It needs to have bearing on and positive provisions for the mobility issues within Balerno.

The Proposed LDP should identify how accessibility and public transport will be improved for the residents of Balerno. There needs to be a clear linkage between transport infrastructure and new neighbourhoods in relation to phasing and programming of development in this part of Edinburgh.

Tarmac (0244)

No modification specified but it is indicated that reference to the City Mobility Plan and associated strategic transport impacts related to the spatial strategy need to be more explicit. It is also indicated that development can facilitate improvement to existing service provision and Bairdview will increase potential patronage making existing supported services more viable.

Mark Ockendon (0419)

Title: "A city where you don't need to own a car to move around" - reword to "A city that's easy and convenient to move around".

Paragraph 2.17: "walking, cycling and wheeling at the top and private car use at the



bottom." - replace with "walking, cycling, wheeling and zero-carbon vehicles operating in an integrated fashion."

Paragraph 2.24: "which are too heavily dependent on private car usage." Should be removed.

Paragraph 2.30: "Together with City Plan 2030, our City Mobility Plan will..." - remove from this sentence onwards and replace with "Together with City Plan 2030, our City Mobility Plan will aim to provide an efficient, convenient, and low-carbon plan to allow the effective movement of people throughout the city. It will include walking, wheeling, cycling, public transport, car sharing and private vehicles with a particular emphasis on low-carbon outcomes. A specific objective to provide free public transport to all residents will significantly help environmental and social outcomes for people from all walks of life."

Paragraph 2.36: "A city where you don't need a car to move around" - reword to "A city that's easy and convenient to move around".

Paragraph 2.40: remove "reduce private car use and"

Paragraph 2.85: "a modal shift away from private car travel" - replace with "a shift away from fossil-fuel based transport towards electric or low-carbon vehicles"

Paragraph 2.86: "City Plan establishes the principle of maximum parking limits for new developments as well as the need for these new developments to incorporate measures to promote active travel and shared mobility to reduce car ownership." - replace with "City Plan aims to improve the convenience, flexibility and affordability of public and shared transport in the city to encourage further use of alternative and low-carbon modes of transport."

Paragraph 2.111: "streets and public spaces for people over cars" - remove or replace with "streets and public spaces for people AND cars"

Paragraph 2.112: remove "follow the transport hierarchy"

Paragraph 2.113: "We are committed to the reduction of traffic and traffic-borne air pollution." - change to "We are committed to the reduction of traffic-borne air pollution." (remove "traffic and")

Paragraph 2.114: "sustainable public transport" - change to "sustainable and affordable or free public transport".

Paragraph 2.115: remove "reducing the need for car journeys".

Paragraph 2.115: "better serves walking, wheeling, cycling and public transport, making these our first choice over travel by private car." - replace with "supports an integrated approach including walking, wheeling, cycling, public transport, taxis, car clubs and private vehicles working in harmony to provide a convenient, efficient, and low-carbon way to travel around the city."

Paragraph 2.117 - reword to: "City Plan 2030 aims to promote the use of sustainable travel modes, without sacrificing flexibility and convenience."

Paragraph 2.118 - reword to "All development must work towards meeting targets to see emissions reduce and air quality improve. The council will encourage a more integrated and accessible public transport system to incorporate all developments, and encourage the use of electric and low-carbon vehicles with a broader Electric Vehicle Strategy for the city." All policies should include provision for electric vehicle charging points.

Paragraph 3.7: "working towards creating a largely traffic free city centre" This should be removed.

Paragraph 3.8: remove completely.

Paragraph 3.9: "a network of vehicle-free streets". This should be removed.

Paragraph 3.9: "restricting loading and servicing". This should be removed.

Place 1, requirement D: "traffic-free pedestrian routes" - replace with "green and convenient transport routes"

Modify criterion (G) of the West Edinburgh Development Principles as follows:  
"...designed for convenient, safe movement of pedestrians, cyclists, and public transport..." - replace with "designed for convenient, safe movement of pedestrians, cyclists, public and private transport", and append "including provision for electric vehicle charging infrastructure"

Modify criterion (N) of the West Edinburgh Development Principles as follows:  
"to minimise need for private car use and private vehicle ownership" - replace with "to integrate private car use with public transport facilities. Ensure support for low-carbon vehicles by providing electric vehicle charging points for all private and some on-street parking."

Policy Inf 5- "Proposals for major development\* which would generate significant travel demand will not be supported where there is a reliance on private car use." Should be replaced with "Proposals for major development which would generate significant travel demand will only be supported where adequate provision for infrastructure for electric or other low- carbon vehicles is included."

Criterion A of Inf 5 should be removed.

Paragraph 3.201 should be removed.

In Paragraph 3.211- remove "reduce reliance on travel by private car and"

In paragraph 3.212- "support wider policy outcomes such as..." - add 'convenience' and 'flexibility' as two of the wider policy outcomes.

#### Juniper Green & Baberton Mains Community Council (0306)

No modification specified but it is indicated that the Low Emission Zone for the city centre (paragraph 2.30, page 13), must be introduced only after transportation changes have been implemented

Paragraph 2.114 should include more detail regarding the plan for "Edinburgh's mass transit network, including proposed new public transport actions".

Alasdair Gillies (0035)

Paragraph 2.17 should be modified so that cars are not at the bottom of the priority list.

No further modification specified but it is indicated that the Council should stop using spaces for people as an excuse to put bus lanes in without proper consultation.

Jean Morley (0461)

No modification specified but it is indicated that older people need more accessible / reliable public transport to make the strategy of being a city where you don't need a car to move around a reality. Bus services need to serve the whole city 24/7

SEPA (0012)

No modification specified but it is indicated that CEC must also deal with historic planning decisions which have seen developments without high quality sustainable travel links, for this outcome to be achieved

Sarah Adamson (0523)

No modifications specified but it is indicated that a priority should be to keep the traffic moving through the Corstorphine shopping area.

Donald Macaulay (0188)

No modifications specified however it is suggested that basic infrastructure (roads and pavements) must be better maintained.

Genna Spears (0081)

No modifications specified however it is suggested that there should be no dedicated cycle lanes. Do not remove parking spaces and introduce parking permits.

Rodger Musson (0162)

No modification specified but it is indicated that any new housing must be planned with local facilities - shops and schools - and adequate public transport links. Proposed developments that do not include this must be refused and the Council must put in place measures to enforce policies to reduce car use in new housing estates

Julie Roberts (0210)

No modification specified but it is indicated that charging hubs for electric vehicles, need to be widely available, especially in areas where there are lots of flats/apartments, who don't have private gardens. We cannot & should not expect everyone to give up the use of a car. It takes away personal freedoms, especially as people get a bit older and cannot ride a bike or walk as much everywhere. Public transport links are not good for many places of interest. Public transport needs to be better thought out when planning timetables.

### Dandara East Scotland (0757)

No modification specified but it is indicated that parking requirements must be based on the levels of accessibility. To suggest that areas which have lower accessibility levels 'don't need to own a car' should not be supported. Particularly within residential developments, sufficient parking standards are essential.

### **Action Programme**

Hallam Land Management (0599), Miller Homes (0649), CALA Management Ltd (0465).

The Action Programme should be updated to provide sufficient details (including costs and timescales) for all proposed transport improvements identified within the Proposed LDP.

Cramond & Barnton Community Council (0243)

The component elements of the City Plan 2030 Action Programme should have target delivery timescales.

Tarmac (0244)

The Proposed LDP should identify how accessibility and public transport will be improved for the residents of Ratho. There is a lack of clear linkage between transport infrastructure and new neighbourhoods in relation to phasing and programming of development in West Edinburgh.

### **Transport Appraisal**

Hallam Land Management (0615)

The Transport Appraisal should assess how existing infrastructure problems may be mitigated by development. It is noted that the Transport Appraisal refers to changing travel patterns as a result of Covid-19, however no evidence of this was presented at Choices. City Plan should take into account any changes to travel demand which will prevail in the future.

Tarmac (0244)

The Mobility Plan needs to reference post-Covid travel patterns and the need for economic resilience. The Proposed LDP should identify how accessibility and public transport will be improved for the residents of Ratho. Update paragraph 2.17 in relation to the Strategic Transport Projects Review 2.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

The plans/indistinct diagrams in the Jacobs Transport Assessment which show 'Residential Development Sites' and 'Site Mitigation' measures in the green belt between Baberton and the A71 need to be redrawn.

Inverdunning (Hatton Mains) Ltd. (0427)

Amend line 1 of 2.112, Outcome 3 - A city where you don't need to own a car to move around "City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas or new sustainable community locations where there is good public transport, including tram and express bus service."

No further modifications specified but it is indicated that there are a series of uncertainties in relation to the proposed City Plan and its background supporting documents including the City Mobility Plan and accompanying Transport Assessment (prepared by Jacobs) which have been identified. These focus predominantly on uncertainties based on assumptions made to accommodate impacts on travel behaviours caused by the COVID-19 pandemic on the modelling work. These could cast doubt on the veracity of the results produced and therefore the evidence used by CEC to allocate residential sites in the proposed City Plan. (Please see supporting document Inverdunning (Hatton Mains) Ltd)

The Hatton Village should be allocated in the City Plan 2030 as it is supported by transport and mobility grounds.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

All proposals set out in tables 6-7, 8 – 9 and 10 of the Proposed LDP should be reviewed based on a reliable impact assessment, taking into account the issues raised in the representation to the Transport Appraisal.

The Transport Appraisal technical note should be updated to remove reference to 20 minute neighbourhoods. In its place, reference should be made to the approved guidance set out in PAN 75.

An updated Assessment should be produced for consultation which fully considers the impact of proposed sites for residential development within the Proposed LDP on the existing road network. The Assessment should also be updated to consider the impacts of greenfield housing sites which have no insurmountable barriers to being brought forward to ensure sufficient housing land is identified within the Proposed LDP to meet the Council's emerging Housing Land Requirement.

The Council is required to update the Assessment to demonstrate that the full impact of the 7,000 homes at H63 Edinburgh 205, has been considered. This new assessment should be prepared in advance of the Proposed LDP being presented to Scottish Ministers for examination.

Liberton & District Community Council (0084)

Liberton & District Community Council is concerned that the Transport Appraisal does not appear to take account of major housing developments in Midlothian which generate traffic movements across Council boundaries, particularly to Fairmilehead, Liberton, and Gilmerton. The proposed A701/ A702 relief road to Straiton is of particular concern. There appears to be no proposals for mitigating these traffic flows.

**West Edinburgh Transport**

Royal Highland & Agricultural Society of Scotland (0482)

Paragraph 3.59 should be amended as follows:

A cumulative Transport Contribution Zone for infrastructure delivery should be on the basis of net additional cumulative impacts of increased traffic flows on the trunk and local road networks (taking into account all known proposed development and any potential cross-boundary impacts).

Living Streets Edinburgh Group (0486)

No modifications specified but it is indicated that development should be expected to follow the same principles as elsewhere in the city, designed accordingly, and contributions secured to carry out the necessary enhancements to tram, rail, bus, pedestrian and cycle infrastructure thereby reflecting the transport hierarchy, this must be made clear at the outset.

Transport Scotland (0480)

The LDP should set out information on the phasing of the West Edinburgh developments within Place 16, including sites H59 – H63 and how this development phasing will be linked to the provision of the infrastructure detailed within Infrastructure Tables 3 – 10 and within the Development Principles of Place 16.

Further information on the delivery of the new tram stop (WE30) detailed within Table 8 – West Edinburgh Transport Improvements should be provided.

The Transport Appraisal details an impact on the M9 southbound on-slip at Newbridge roundabout as a result of cumulative impact of the developments in West Edinburgh. The impact presented details a 50% increase in Passenger Car Units over a 2 hour period, an increase of 854 in the AM period. This is a significant increase which requires measures to be implemented to promote a significant shift to sustainable travel modes and development phasing implemented to minimise the impact.

Joint representation made by Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761), West Town Edinburgh Ltd (0660). (See supporting documents: West Town Edinburgh Ltd ANON-CUYN-2UJZ-A, Edinburgh Airport Limited ANON-CUYN-2UTK-5, Crosswind Developments Ltd ANON-CUYN-2RH9-4)

Map 24 should be replaced with a joint Movement and Access Plan. The Proposals Map, Map 1, Map 2 and Map 8 should also be amended as per the Movement and Access Plan.

In relation to East/West connections the following alterations are proposed, which are included in the Movement and Access Plan.

- (i) The A8 as the primary connection East/West with 2 key access points for the West Edinburgh sites – Gogar Roundabout and Eastfield Road Dumbbells.
- (ii) The new Main Street (TR-CZ-WETA-6 / WE 26). Map 24 illustrates two new primary vehicle routes into West Town – route 1 running West from Myreton Drive which is the Gogar Link Road alignment from the existing LDP and route 2

running southwest from the airport link road north of Crosswinds which is akin to the IBG Link Road / New Main Street illustrated in the WETA refresh. Route 2 is preferred by WTL as the New Primary Route into West Town.

- (iii) A new connection to the Eastern Terminus of the Airport (TR-CZ-WETA -18 / WE29) with the option to also connect to the Airport's cargo village.
- (iv) A new rail crossing point for buses and active travel only as part of the Bus Orbital (WE12)

In relation to North/South Connections, the following alterations are proposed;

- (i) Eastfield Road
- (ii) Airport Link Road
- (iii) Potential vehicular link to A8 from main street indicated on map 24.

In relation to new pedestrian / cycle connections (East/West connections)

- (i) WETA identified missing A8 link (TR-CZ-WETA-1 / WE7)
- (ii) New connections via new Local Centre, WTL land
- (iii) New connections via new rail bridge at Gateway Station and along Myreton Drive to West Craig's land.
- (iv) New connections via existing/new rail crossing from CDL to Maybury linking to wider connection planned at Turnhouse and the River Almond walkway.
- (v) New connections from CDL land to WTL land

(North/South connections)

- (i) New link to the Airport adjacent to Eastfield Road (TR-CZ-WETA-5 / WE23)
- (ii) New link to Airport from Myreton Drive adjacent to Airport Link Road (TR-CZWETA- 19 / WE 27)
- (iii) New link through new Local Centre, CDL land
- (iv) New connections to EAL from CDL and WTL v New connections from WTL to A8
- (v) New connection via Gogar Castle Drive to A8.

Crosswind Developments Ltd (0184) (Edinburgh Airport Limited (0761)

The Movement and Access Framework plan (See supporting documents: West Town

Edinburgh Ltd, Edinburgh Airport Limited, Crosswind Developments Ltd) should replace the current Map 24 of the proposed City Plan.

Active travel safeguards through West Edinburgh should be added on Map 1.

The position of the Orbital Bus Route shown in Map 1 needs to be modified to correctly align with the Errata. The Orbital Bus Route shown in Map 1 and Map 2 need to be modified so that they align.

The quality of Map 1 and Map 2 should be improved and would benefit from having policy references to aid the reader.

The WETA Refresh 2016 (WETA) interventions should be included on the Proposals Map. TR-CZ- WETA- 17 and TR-CZ-WETA- 18.

WE27 should be removed.

Criteria (l.) (m.) (n.) and (o.) of the West Edinburgh Development Principles should be amended as follows to remove the reference to an approved masterplan being required for the full West Edinburgh area.

Criterion (L) of the West Edinburgh Development Principles should also be amended as follows

“To address and connect across land ownerships and to the wider City – physically, visually and socially, including with urban frontages to site edges where appropriate and with active travel and public transport infrastructure which enables movement around the area and to the city. Active travel and public transport connectivity between the sites and to the north will be enabled by each development site as far as is reasonable and feasibly possible. Public transport options for orbital bus routes to north and south will be delivered either through improvements to public transport priority at the Gogar and Maybury roundabouts or through public transport access to the north. The Council will co-ordinate a joined-up approach in line with the Movement and Access Plan”

Criterion ‘M’ of the West Edinburgh Development Principals should include the Airport Link Road and IBG Main Street as follows:

“Road access which follows the principles of the WETA programme in providing a new Gogar Link Road, Airport Link Road and IBG Main Street and access from Eastfield Road will be supported. Planning applications should address the potential for local access from the south of the area to the A8 in conjunction with transport and traffic improvements.”

Criteria ‘n’ and ‘o’ should also be modified as below:

“n. Internal connectivity for active travel and public transport modes, including relationship with the Ingliston Park & Ride site and how that site might be relocated or redesigned for the better overall place making of the area. Planning applications should develop a design, parking strategy and parking standards approach to minimise need for private car use and private vehicle ownership. This and other demand management measures are an important element of relevant local, regional and national policies and will be critical in promoting sustainable travel behaviour in West Edinburgh area”.



“o. Planning applications should establish how a mix of uses, including vertical mix, is distributed across the area. The mix will include but not be limited to retail, professional services, food and drink, office and light industrial, industrial in appropriate locations away from residential use, assembly and leisure and community facilities/hubs as well as high and medium density residential with mixed tenure development as required by other plan policies”.

The errata and the maps of the Plan should be updated and aligned in relation to Proposals Map, Map 24, Map 1, Map 8. The new primary vehicle route on Map 24 should be located on the eastern side, adjacent to the railway lines.

#### West Town Edinburgh Ltd (0660)

Map 2 should be amended to reflect the 'movement and access' plan at appendix 2 of West Town Edinburgh Ltd's representations and which forms part of joint representations by West Town Edinburgh Ltd, Edinburgh Airport Ltd and Crosswind Developments Ltd. (See supporting documents: West Town Edinburgh Ltd, Edinburgh Airport Limited, Crosswind Developments Ltd)

The visual representation of certain 'Transport Proposals and Safeguards' on map 8 should be amended to reflect the 'movement and access' plan at appendix 2

West Town Edinburgh Ltd does not support map 24 in its current form. This should be amended to reflect the 'movement and access' plan at appendix 2 of West Town Edinburgh Ltd's representations and which forms part of joint representations by West Town Edinburgh Ltd, Edinburgh Airport Ltd and Crosswind Developments Ltd.

Map 24 should reflect or recognise 2 recent planning applications (20/03219/PPP and 21/00217/FUL).

City Plan should also make clear that the route is indicative at this stage and may involve multiple stakeholders and development sites. It should be stated that the city council will ensure that delivery of the route will be appropriately managed and coordinated to the benefit of all development in West Edinburgh.

The proposed primary vehicle route should be slightly amended from the Gogar Roundabout. A new junction will be required to enable the new WTL road to connect but this we believe can be accommodated in due course and will be part of the planning application for the new preferred WTL primary access.

No new primary vehicle link is shown to the Airport on Map 24. We have added this to ensure that as per the Transport Assessment, that supports the PLDP, the WETA Airport Link Road is included to provide network resilience, relief to Eastfield Road and access to development lands. We have added new public transport routes proposed in the Transport Assessment as per the errata.

West Town Edinburgh Ltd request that in the event that the City Council are of a mind to amend City Plan as requested in the joint representation they do so on the condition that the parties demonstrate that agreements are in place to secure delivery of the

interventions contemplated.

Paragraph 3.59 should be modified so that cumulative assessment is not required within individual site specific transport assessments in this case. It should also be made clear within the Place 16 section of the proposed plan that IBG 1 (Which is identified on map 25) will also form part of the assessment of mitigation required arising from its impacts on various infrastructure matters.

#### West Craigs Limited (0472)

The proposed route of WE16 and PT6 should be amended so that it does not cross into HSG19. The full text of paragraph (z) of Place 16 policies should be provided in full.

Additional clarity within the policy wording is required to ensure that vehicular access to H62 and the Tram Depot will be safeguarded, as per the existing T9 (Gogar Link Road) allocation contained within the currently adopted Local Development Plan (2016).

#### Rosebery Estate (Bankhead) (0618)

Delete the annotation on Maps 2 & 8, and all other references relating to the West Edinburgh Transport Improvements (WE12) in so far as they show a potential connection from the new addition to Place 16 adjacent to H61 linking over the railway into the Maybury (Place 22/HSG19) housing allocation being carried forward from the LDP.

The potential link to the north proposed under (WE12) with a landing point in HSG19 should be removed. Delete reference to link with West Craigs/Maybury and replace with "use existing bridge to west. Confirm that the cumulative Transport Contribution Zone (Para 3.59) will only apply to those sites in Place 16/West Edinburgh allocated in this document, not sites being brought forward from the LDP which are in the process of being delivered.

#### Lynn Grattage (0362)

In respect of WE5 a new bus lane will be required and an off road cycle lane.

#### NatureScot (0528)

No modification specified but it is indicated that further work needs to be carried out to ensure that the active travel connectivity within Place 16 should be progressed. The path network in this area will be required to accommodate significant numbers of people and for this to be convenient and safe more capacity (both extent and width) will be required.

#### Murrayfield Community Council (0146)

Public transport routes shown should be specified as tram routes.

#### Grange/Prestonfield Community Council (0192)

No modification specified but it is indicated that where proposals affect more than one transport mode, e.g. rail and bus, interchange between modes of travel including pedestrian must be facilitated.

Ratho and District Community Council (0289)

WE15- Its location should be noted on proposals map and needs road safety input.

WE19/20- It is indicated that significant consultations on this are required. WE21- Greater detail on this route needs to be provided.

Infrastructure must be in place prior to the commencement of development and in particular improvements to the A8 and the Gogar Roundabout to meet the additional vehicular traffic including construction vehicles and buses as well as private cars.

Simon Hindshaw (0095)

WE27 (Gogar Link Road Segregated cycle route) needs to be justified.

Alasdair Gillies (0035)

WE6 should be removed. WE12 and WE16 should be modified to be extended to Cramond and to reintroduce public transport to Edinburgh park.

Spokes Lothian (0545)

No modification specified but it is indicated that safeguards for active travel & public transport improvements should be prioritised and even be in place before the improvements that benefit car users. The proposals for Eastfield Road will again induce more car based journeys to and from the airport and make public and active travel modes a less attractive alternative.

Hallam Land Management (0615)

No modification specified however it is indicated that neither the WETA or WETIP reports, on which the Council relies heavily within the Proposed Plan, assess or appraise the level of housing now being proposed. In fact, the original 2010 WETA assessment assumed very little housing at all.

Tarmac (0244)

No modifications specified but it is indicated that this section on West Edinburgh needs a complete review and clear justification before any decisions on a finalised plan is made. Supporting studies and resultant reports are required to justify the Council's recent change in approach to West Edinburgh proposals.

Juniper Green and Baberton Mains Community Council (0306), Archie Clark (0003)

Definitions of acronyms should all be included in the glossary.

Page 76 contains, "a. Provide or contribute towards the following transport infrastructure:" where it appears elaboration should follow the colon, but there is no further content concerning this bullet. This should be clarified.

Page 77, bullet i, refers to, "Adoptable roads to be brought up to standard and an Internal

CPZ...", with no explanation of what CPZ is. This should be explained.

A long-term detailed masterplan for West Edinburgh needs to be prepared by CEC well in advance and the traffic plan modelling checked by an independent reputable university.

Clarification is required as to whether the statement "Additional capacity on the road network for private car use is not supported" in paragraph 3.224 would apply to the Gogar roundabout?

No further modification specified but it is indicated that the Gogar Roundabout and surrounding roads are not capable of taking the enormous additional traffic that will be generated by this development (Map 24). An accident on the Gogar Roundabout would have immediate and far-reaching consequences on all the roads leading to it. It could also impact on the airport.

#### Cramond and Barnton Community Council (0243)

No modifications specified but it is indicated that the Community Council is not confident that the Council will deliver travel infrastructure, education and other services to scales and timing fully compliant with 'infrastructure first' principles, or that traffic assessments and management measures, including actions to deter commuting and reduce car mileages, will adequately mitigate the impacts on communities neighbouring the A90 and A8 roads into the City from the impacts of traffic generated by all West Edinburgh developments and current and future traffic flows from West Lothian and Fife

#### Corstorphine Community Council (0799)

Criterion (n) of the West Edinburgh Design Framework could be expanded to include mitigation measures so that people do not attempt to garner free long-term car parking when going on their holidays.

References to accessibility and equalities should be added as part of the West Edinburgh Design Principles. This would include elements like fully lit active travel routes that are overlooked and not isolated, adequate disabled parking provisions that allow people with limited mobility to access amenities without impediment, and strict adherence to the Edinburgh Street Design Guidance, so that accessible design is inbuilt throughout. It is indicated that references to air pollution and mitigation measures should be included within the Design Principles.

#### Network Rail (0071)

No modifications specified but it is indicated that further infrastructure will be required at rail stations near West Edinburgh to accommodate a significant increase in additional journeys. This could include an increase in facilities such as footpath/cycle links, cycle lockers, bus turning areas, taxi ranks, electric bike charge points, ticket machines and waiting shelters. The requirement for additional set down areas, car parking and electric car charging points need to be fully assessed. The West Edinburgh development should therefore demonstrate the impact of the proposed increase in different modes of travel to and from nearby stations and further discussions held with Network Rail and Scotrail to agree how this impact can be accommodated.

Anna Goodwin.(0302)

Paragraph 3.59 page 72 should be amended so that the word should will be replaced with must. "These should include modelling of cumulative effect of increased traffic flows on the trunk and local road networks (taking into account all known proposed development and any potential cross- boundary impacts).

Michael Ramsay (0011)

No modifications proposed but the question is asked whether the master plan with traffic assessments and consideration of infrastructure will be available for the decision process.

Pawel Stankiewicz (0445)

In the criterion u on page 76 it should be added:

"Active travel route should run in some distance from primary vehicle routes, ideally in the middle between them, through the middle of urban blocks, where these primary vehicle routes are not main travel destination like local centre. Tram stops are focus points of footpaths coming to them diagonally across urban blocks"

#### **INF 4: Provision of Transport Infrastructure**

West Town Edinburgh Ltd (0660),

Wording of criterion (a) of Inf 4 should be amended so that only an individual site specific transport assessment would be required to examine the individual transport impacts on the local road network, in accordance with established Governmental Transport Assessment Guidance.

Crosswind Developments Ltd (0184)

No modification specified but it is indicated that the approach set out in the policy goes beyond Transport Scotland's current Transport Assessment Guidelines, most notably in relation to 'cumulative transport impacts'.

Edinburgh Airport Limited (0761)

The Policy should be rewritten to be consistent with Transport Scotland's current guidance. Assessment requirements on a site by site basis should be for committed/consented development only not for all the possible interventions listed in City Plan 2030.

Homes for Scotland (0404), Wright PDL (0078), Barratt David Wilson Homes (0677)

No modifications specified but it is indicated that it will be important that the Council avoids a situation where the delivery of early phases of large sites are stalled because all of the land required for the necessary/desired connections is not in the applicant's control.

Ratho and District Community Council (0289)

No modification specified but it is indicated that in relation to Policy Inf 4, Infrastructure must be in place prior to development.

## **INF 5- Location of Major Traffic Generating Development**

### Hallam Land Management (0615).

The word 'reliance' should be removed from the policy and substitute the words '...it is overly reliant...'. The word 'very' should be removed in the second sentence.

A new criterion (c) should be added. "a Travel Plan that responds to modal share targets and mitigates any adverse effect on the network by more sustainable travel choices". Quantification is needed so it is clear what level of trip generation is considered 'major' and what classifies as "good" accessibility.

### Tarmac (0244)

The word 'reliance' should be removed from the policy and substitute the words '...it is overly reliant...'. The word 'very' should be removed in the second sentence.

A new criterion (c) should be added. "a Travel Plan that responds to modal share targets and mitigates any adverse effect on the network by more sustainable travel choices". Quantification is needed so it is clear what level of trip generation is considered 'major' and what classifies as "good" accessibility.

### Steve Loomes (0767), Wright PDL (0078), Homes For Scotland (0404), Barratt David Wilson Homes (0677)

Clarification is required as to what is considered to be a "significant" trip generating use.

### Miller Homes Limited (0649), Hallam Land Management (0599)

No modification is specified however it is indicated that it is inappropriate to have such an ambiguously worded policy within the development plan. Impacts of developments on the transport network and modes should be considered on a case-by-case basis in accord with the relevant national and regional guidance.

### Avison Young for Aldi Stores Ltd (0526)

The phrase 'very good' should be removed or further clarification is provided to measurable factors for 'very good accessibility'.

It is suggested the first two sentences of Inf5 are merged to the following:

"Proposals for major development\* which would generate significant travel will only be permitted on suitable sites with good accessibility by sustainable transport, where the private car isn't prioritised."

### Living Streets Edinburgh Group (0486)

The word "major" should be removed from the first sentence. The Council's strong position that development predicated on private car use will not be supported should be

reflected throughout the place and subject policies in the plan.

Cockburn Association (0777)

Clarification of what criteria will be used to determine 'very good accessibility by sustainable transport' is required.

Cynthia Shuken (0632)

Cycle lane barriers should be removed, Sunday parking downtown reinstated and bus stops increased.

**INF 11: Public Transport Proposals and Safeguards, Table 6, Table 7 & Table 10**

Hallam Land Management (0615),

Add new sentence to policy Inf 11: 'Proposals which are brought forward by developers and others to improve the public transport services or enhance existing provision will be supported'.

No other modifications specified however it is indicated that public transport strategy and detailed improvements are not evident through the LDP. The implications of public transport proposals are not included within this part of the city and it is not clear if any will 'come forward'.

There may be a case where development can facilitate improvement to existing service provision. The 'Edinburgh Strategic Sustainable Transport Study, Regional Transport Strategy and Strategic Transport Projects Review 2' are not available for consultation as part of the LDP which is reliant on these assessments.

Bo Adams (0363)

No modifications specified but it is indicated that the positioning of bus stops around Kaimes Junction and Frogston road need to be looked at.

National Galleries of Scotland (0725)

The Proposed Plan should also explicitly acknowledge, after para 3.212, that in order to deliver some of the safeguarded active travel routes, including ATPR46 which in part links West Granton Road with Waterfront Avenue, the Council may need to use its Compulsory Purchase Order (CPO) powers.

Tarmac (0244)

Add new sentence to policy inf 11 'Proposals which are brought forward by developers and others to improve the public transport services or enhance existing provision will be supported.

No modifications specified but it is indicated that there may be a case where development can facilitate improvement to existing service provision, for example. In a rural location a new housing development could introduce new bus stops on existing routes, or influence

bus routes. A development could contribute financially to continue or provide a rural bus service.

Simon Hindshaw (0095)

No modifications specified but it is indicated that the rail proposals would benefit from the input of somebody who has some railway operations expertise. In terms of PTSG2, the East Coast Main Line is currently at or near capacity so the practicality of introducing three additional stops in the City in addition to those proposed or being delivered in East Lothian is questionable without a step change in infrastructure such as four tracking.

Louise Baker (0773)

No modifications specified but it is indicated that the importance of peripheral connectivity within the city requires greater consideration. Better integration of more affordable bus services and also bus with tram services would be beneficial.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Orbital Bus routes should be shown on a clear map. Routes should be continuous (and not broken at the Musselburgh end) Orbital routes should be linked with an express bus connecting the park and ride's along the route using the Outer City Bypass.

No further modifications specified but it is indicated that it would be very useful to know what the two mass rapid transit routes for the city as stated in Section 3.212 are. It would help if they were included as dotted lines on the transport maps.

Archie Clark (0003)

The data to justify the proposals (Transport Proposals and safeguards) needs to be clearly shown. The drawings in Transport Appraisal Technical note need to be clearer. The tram option safeguards should be removed for those lines not commenced and not renewed.

The former railway tunnel should be added to table 10 and safeguarded to be utilised as a pedestrian traveller to link Waverley Station to a tram/bus stop in St Andrews Square. (See supporting document Clark, Archie ANON-CUYN-2R14-8)

Robert Drysdale (0354)

Policy Inf 11, Table 7, Table 10, Proposals Map (North East) (North West) (South East) and map 1 and 2 should be altered in accordance with my representations. (See Supporting document Drysdale, Robert)

Include my proposed additional tram line safeguards, as shown in my Diagrams (see Diagram 1 – Proposed Changes to Spatial Strategy;

Diagram 3 - Proposed safeguarding of former railway for future tram line - Crewe Toll to Ocean Terminal; Ferry Road is heavily congested and inhibits east-west travel by car or bus between Edinburgh's northern suburbs; this route would serve densely-populated areas as well as connecting into the existing tram route at Ocean Terminal and the



proposed tram route at Craigleith. The formation is wide enough to allow retention of the existing foot/cycle path and much of the existing vegetation.

Diagram 4 - Proposed safeguarding of route for future tram line: Craigleith to Silverknowes; The former double-track railway from Craigleith (on the approved tram route TR2) to Davidson's Mains, which consists of a wide tract of undeveloped open land, should also be protected as a possible future tram route to serve other densely-populated parts of the north-west of the city, connecting these residential areas to the city centre, Haymarket and west Edinburgh by fast tram on a traffic-free route.

Diagram 5 - Proposed safeguarding of route from Princes Street (West End) to Newington via Lothian Road and Melville Drive); This should be from the west end of Princes Street southwards down Lothian Road and then across the Meadows to Newington.

Table 10, page 178 - PTSG3 - South Suburban Halts - rectify omission - add safeguard for station/halt at site of former Craiglockhart Station, Colinton Road (NT233713). This should be added to the south-east proposals map. The safeguard for a station at the site of the former Craiglockhart Station on the South Suburban railway has been inexplicably omitted from the plan. The station would serve a substantial residential area in south-west Edinburgh and consequently a safeguard for this site should be added.

Tr3 option B2 should be deleted from the plan.

The following statement, based on the wording of paragraph 9.31 of the 2010 Edinburgh City Local Plan, should be added to Policy Inf 11 and also included in the introduction to Table 7, as follows: 'In addition to the specific route safeguards listed in Table 7, the city's other former railway routes represent a valuable transport asset and development proposals will be assessed to make sure the technical integrity of the route for possible future public transport purposes (e.g. rail, tram or guided busways), as well as for cycle/footway use, is not compromised. They are also often wildlife corridors and in implementing proposals steps will be taken where possible to retain their nature conservation value'. A further requirement should also be added to this policy, cross referenced to policy Inf 4, relating to the safeguarding of former railway lines as they were under the Structure Plan and City Local Plan.

Table 10, page 178 - under heading 'Public Transport - Other Safeguards', replace existing paragraph with: The council wishes to see greater use made of the city's rail network as part of the contribution towards reducing emissions and a net zero city. In particular the City Plan 2030 Proposals Map identifies locations where new railway stations will be supported. These safeguards are to ensure that other development does not prejudice the future provision of these stations / halts. This should be added to the north-east proposals map.

University of Edinburgh (0464)

No modifications specified but it is indicated that careful consideration is required to achieve a suitable balance of public transport infrastructure with the unique character of Edinburgh City Centre and if any safeguard options impact upon the landownership

of the University of Edinburgh estate, further dialogue is requested.

Cramond & Barnton Community Council (0243)

PT6 should be extended at least to Barnton, or preferably to Cramond, to provide links to The Gyle, Gateway Station and indirectly to the Airport.

Friends of Cammo (0387)

Spatial Strategy Maps 1 and 2 need to be consistent on the route taken near Maybury junction.

NatureScot (0528)

No specific modification specified however it is suggested that proposals for the North and South Orbital should have more explicit links with active travel routes.

Mrs Patricia Scott (0349)

Route PT6 should be extended at least to Barnton and Cramond to provide a link from Cramond to the Gyle, Gateway Station and the airport.

Inverdunning (Hatton Mains) Ltd.(0427)

An A71 Corridor Express Route/Rapid Bus Transit (Livingston South to City Centre) should be added to table 6.

Alasdair Gillies (0035)

PT6 should provide a link from Cramond to Edinburgh park

The Davidson's Mains and Silverknowes Association (0454)

The orbital bus services round the north west of the city should include improved direct links between Cramond and Davidson's Mains and between Davidson's Mains and Stockbridge . The transport hub at Ingliston should be fully developed as an intermodal interchange for all transport links and linked into orbital bus service routes.

Ratho and District Community Council (0289)

No modifications specified but indicates that the Orbital Bus Route should commence operation as soon as any houses/businesses open in order to relieve congestion on A8

Jean Morley (0461)

Cramond to the Gyle and the Airport should be a bus link that is introduced via Maybury Road.

Lynn Grattage (0362)

At least another orbital bus route is required. One just on the south side e.g. Corstorphine - sighthill - craiglockhart - braids - niddrie, the other a more full loop going a bit closer to the centre but still as far out as e.g. craigleith, clermiston, chesser, morningside, newington, Willowbrae. Could the hard shoulder of the bypass be made into a bus lane with a service where it exists?

Lady Road Investment S.A.R.L. (0625)

No modification specified but it is indicated that the exact location and impact of the route (TR6) should be discussed further with all stakeholders to ensure the most efficient and appropriate route is provided for.

Miller Homes Limited and Wheatlands Farming Partnership (0592)

Table 7 of the Proposed LDP should be revised to identify the safeguarding of a tram route between Newbridge and Kirkliston. Table 10 of the Proposed LDP should be revised to safeguard the location for a proposed rail station as shown as part of the proposal for a housing and mixed use development at Kirkliston East.

Alan Stevens (0646), B Hyland (0792), Sustrans (0561), Alistair Mackintosh (0650), C van der Dussen (0558), Claire Graf (0541), Connie Longmate (0707), Hannah Knechtli (0259), Jakub Szwedowicz (0547), Joseph Coulson (0017), Katarzyna Wozniak (0546), Jordan Thomson (0676), Kasper Schwartz (0576), Fraser Wilson (0536), Despoina Papadopoulou (0575), Hannah Coulson (0331), Mark Beaumont (0752), Peter Moonlight (0550), Sandra Labinjoh (0690), Sophia Lycouris (0667), Graham Jones (0340), Mattia Ventre (0763), Catherine Labinjoh (0711), Andrew Longmate (0705), Heather Duque (0746), Patrick Longmate (0708), Gareth Wheeler (0636), Katherine Kennedy (0569), Heather R Finnegan (0664), Zuleika Connolly-Jones (0656), James McMeekin (0631)

It is indicated that Tr2 Safeguard option B1b should be removed from the plan.

John Yellowlees (0024)

No modification specified but it is indicated that the existing safeguard Tr2 should remain instead of new safeguard Tr3.

John Watt (0321)

The tram network to the ERI and Bioquarter and then to Shawfair needs to be tied into a Park and Ride facility. Consideration should also be given to a congestion charge or other disincentives to reduce car access to the city centre and improve active travel modes.

Shawfair LLP (0258)

The tram safeguarded route shown in Maps 1 and 2 requires to be amended over the settlement of Shawfair.

Capital Rail Action Group (0789)

Safeguard tram route Tr4, should be replaced with the following route: Up The Mound, George IV Bridge, Potterrow, Buccleuch Street and Hope Park Terrace - to then run forward via South Clerk Street, Newington, Cameron Toll and the Old Dalkeith Road to the BioQuarter.

It is also indicated that coming from Newhaven, trams heading to the BioQuarter could run via Leith Street and the Scott Monument to form the operational loop proposed by TR5. An additional tram route running via Lothian Road, Tollcross and Melville Drive to Hope Park Terrace is also worthy of consideration.

PTSG3 should operate tram-train to heavy rail running - with a connection made from the existing tram lines around the Murrayfield area then run to Cameron Toll to then bridge down to street level to run via the Old Dalkeith Road tram alignment to the BioQuarter in time they could also run forward via Craigmillar, Brunstane and Portobello to form a tram-train loop back to the city centre via Meadowbank and an alignment allowing them to gain Regent Road and Waterloo Place via Regent Road Park. Such an alignment would also allow potential tram-train running via the Lochend Butterfly developments to Granton via Easter Road, Leith Walk, Powderhall, Ferry Road and Trinity. The old railway alignment from Crewe Toll to Ocean terminal should be safeguarded for light rail.

Indicated that Tram-trains could run via the proposed developments at Seafield to join the tram line being built at the northern end of Constitution Street. The defunct Leith South Goods Yard should also be looked at to see whether the material currently being moved by lorry from the adjacent NWH Group depot could instead be moved by rail.

#### Spokes Lothian (0545)

The plan should state that the former rail corridor will include a high quality active travel route (Active Freeway) alongside the tram, together. It must also be clear what 'high quality' would mean.

PTSG 2 and PTSG 3 should be reflected in the Transport assessment assumptions, learning from Edinburgh Strategic Sustainable Transport Study & informing the soon to be announced STPR2 outcomes by Transport Scotland.

#### Peter Brown (0672)

The south suburban railway and stations should not only be safeguarded but be reopened to passenger traffic. Other closed railway lines should also be safeguarded for future reopening

#### Suzanne McIntosh (0409)

City Plan 2030 should make provision for the re-opening of the south sub-urban rail network.

#### Theo Spanellis (0415)

No modification specified however it is indicated that safeguard PTSG3 should be removed from the plan.

Robert Falcon (0640)

No modifications specified however it is indicated that the plan should include details on the infrastructure and other developments required in order to enable the safeguards noted in table 10.

Mr Cuchulainn Gent (0047)

No modifications specified however it is indicated that new rail stations at Meadowbank and Portobello should be part of the plan as well as expanding the options for rail-to-bus or active travel interchange at these locations and upgrading the entire Eastern approach. The plan should also encourage the South Suburban Line to be opened and utilised as a light commuter rail route.

Peter Allen (0336)

The old rail tracks that still exist at Seafield, should be added as a safeguard within the plan.

Grange/Prestonfield Community Council (0192)

Insert requirement within PTSG3 to review Cameron Toll halt.

Transport Scotland (0480)

The rail stations detailed within Table 10 p178 – Public Transport – Other Safeguards under PTSG 2 and PTSG 3 should be removed.

Mike Richardson (0109)

The orbital bus route in Map 1 should be complete and continuous - it appears to be shown with a break in the Newcraighall area. It should be possible to travel around the orbital route in either direction without interruption.

Miller Homes Ltd (0256)

No modification specified but it is indicated that justification should be provided as to why the transit corridor towards the west of Hermiston, which was previously recommended for further consideration in the Edinburgh Strategic Sustainable Transport Study – Phase 1 (October 2019) has been excluded. Any longer-term vision for a transit corridor to the west of Hermiston should be included in the City Plan now. Riccarton Village can also assist with the longer-term vision of the transit corridor towards the west of Hermiston by creating a critical mass in this area and delivering a transport hub including a park and ride.

**INF 13: Road Network Infrastructure**

Edinburgh Airport Limited (0761)

No modifications specified however it is indicated that EAL object to Policy Inf 13 on the grounds it references new transport infrastructure and junction improvements listed in Part 4 and shown indicatively on the Proposals Map however the Proposals Map does not align with the requirements of WETA Refresh 2016 or indeed the listed transportation improvements in Part 4 of the proposed City Plan.

Bo Adams (0363)

No modifications specified but It is indicated that Kaimes Junction, Burdiehouse, Frogston, Captains and Liberton roads should all be included in table 9 (Road Improvements). It is also indicated that there needs to be focus on noise reduction around bypass, noise absorbing asphalt combined with noise cancelling panels should be used along the bypass.

Corstorphine Community Council (0799)

Paragraph 3.214 should be amended to state that any proposed infrastructure changes should also support and prioritise sustainable transport, including public transport and protected on-road cycle provision.

West Town Edinburgh Ltd (0660)

No modifications specified but it is indicated that policy should permit the ability of large scale development to provide a permeable network of access points for all modes of travel to ensure a legible network that maximises use of existing infrastructure, whilst prioritising sustainable travel modes over private car use.

Spokes Lothian (0545)

The City Deal should be modified at the request of City of Edinburgh Council to remove the Sheriffhall Junction upgrade (R10). Junctions citywide should be retrospectively improved to embody the transport hierarchy, prioritised for safety and VisionZero design principles.

Miller Homes Limited and Wheatlands Farming Partnership (0592)

Table 9 of the Proposed LDP should be revised to identify the delivery of a new loop road around the east of the settlement of Kirkliston. No further modifications proposed but it is indicated that the delivery of this new loop road forms part of the proposal for a housing and mixed use development submitted by Miller Homes Limited (Miller Homes) as part of this consultation process. The delivery of the proposed loop road will improve road safety and provide relief from the existing traffic issues in Kirkliston by diverting traffic away from the centre of the settlement.

Mrs Patricia Scott (0349)

No modifications specified but it is indicated that proposals to adjust the phasing or otherwise of the traffic lights (R8) will do little to alleviate existing and major problems associated with the design of the junction itself nor projected greatly increased traffic

volume.

Mr John G. Skinner (0065)

No modifications specified but it is indicated that the action (R8) is underwhelming with reference to the existing traffic at peak times.

Leonard Wallace (0314)

More specification of the proposed changes is required (In respect to action R8 in table 9) The following additional specification ought to be considered in terms of Road Improvements: Speed monitoring, control and some form of traffic calming is required on the Cammo Crescent stretch, prioritising pedestrians waiting to cross is required.

Any change to the sequence of the lights should allow short gaps which would continue to facilitate residents around the junction safely exiting their properties.

Forth Ports Limited (0496)

No modifications specified but indicates that the route (R1) crosses the operational port estate.

The Davidson's Mains and Silverknowes Association (0454)

Barnton junction (R8) should be completely re-modelled to give priority to public transport.

Network Rail (0071)

A policy statement associated with R1 should be included which makes it clear that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing, alternative approaches should be explored, and developer funded.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Improvements to the Dalmahoy Road junction on the A71 should be included in Table 9.

Archie Clark (0003)

Works to install a MOVA system at Gillespie Crossroads junction on Lanark Road should be included in table 9 with a timescale.

Jean Morley (0461)

Changes to the lights from Cramond Brig to Craigleith (R8) must reflect the safety of residents on both sides of the road to get in and out of their drives safely.

Cramond & Barnton Community Council (0243)

Table 9 should include additional Park-and Rides, peak period congestion charges, better traffic queueing measures (Dalmeny to Barnton), a cross-Forth ferry service, while avoiding the diversion of traffic into residential areas (e.g. Cramond, Barnton, Davidsons Mains). The Queensferry Road corridor between Craigleith and Barnton should be designated as an Air Quality Management Area.

Gavin Cameron) (0782)

No modification specified, however, it is indicated that signal efficiency is not the issue at Barnton.(R8) Instead it is the Circa 600 houses which were approved and are now being built.

SEPA. (0012)

No modification specified, however ask for careful consideration of those parts of these proposals which may act against the aims of Edinburgh achieving its targets for net zero by simply enabling further use of the private car.

**INF 14: Rail Freight**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

No modification specified but the question asked if Edinburgh's current under-utilised rail network could be engaged in development of a fast and sustainable passenger transport network, or goods distribution network – even if only to the freight distribution hubs as visualised in section 3.245 on page 137.

Forth Ports Limited (0496)

Delete the second sentence of paragraph 3.215, in Inf 14 which reads “Keeping a reduced general freight rail head to the east in Seafield will complement the safeguard for a waste management facility in that location (see Policy Inf 18).”

**Summary of responses (including reasons) by planning authority:**

**Transport Strategy and General Comments**

Cramond and Barnton Community Council (0243)

One of the four key aims of City Plan (CD001) is to limit the need for people to have to own and travel by private car, by supporting everyone to travel more sustainably. This is a key element of the National Transport Strategy 2 (NTS 2) (CD110), the draft National Planning Framework 4 (NPF4) (CD099) and the Council's approved local transport strategy, the City Mobility Plan (CMP) (CD062). City Plan seeks to ensure the provision and promotion of high quality and readily accessible public transport services and well connected, safe active travel infrastructure to achieve this outcome.

Paragraph 2.111 expands on the aim and states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding public transport. City Plan 2030



aligns with and assists in the delivery of many of the CMP's objectives, policy measures and commitments and will support the Council in meeting its target of reducing car kilometres. City Plan 2030 promotes an infrastructure first approach to community development, directing development to where there is existing infrastructure. It is also noted that City Plan 2030 also has three other outcomes which are: A sustainable city which supports everyone's physical and mental wellbeing, A city where everyone lives in a home they can afford and A city where everyone shares in its economic success.

Each of the outcomes also have separate paragraphs within part 2 of the plan that provides further detail on the individual aims. The Council considers the wording of the outcome to be a succinct and accurate summary reflective of the approved CMP and relevant national policy.

Energy and Waste policies are included under this outcome as they are resources and services which are part of the City's essential infrastructure. **No modification proposed.**

Homes for Scotland (0404), Wright PDL (0078), Steve Loomes (0767)

City Plan (CD001) aligns with and assists in the delivery of the City Mobility Plan's (CD0062) commitment to make Edinburgh a city that welcomes everyone, where the streets are for people not cars, and with accessible and pleasant places to safely walk, wheel and cycle around. City Plan promotes an infrastructure-first approach to community development, directing development to where there is existing infrastructure or where infrastructure can be provided.

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the spatial strategy and allocation of sites included within the Proposed Plan. The approach taken was guided by Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) (CD112). City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram. City Plan reflects and embeds the travel and investment hierarchies set out in the Infrastructure Investment Plan (CD159) and NTS2 (CD110) within the appraisal and assessment of potential development options to inform the spatial strategy from the outset.

The Council considers that pursuing a redevelopment strategy, as set out in paragraph 2.112 of the Plan, is likely to have fewer overall traffic impacts than a greenfield housing development strategy because it will bring forward sites with much better accessibility to sustainable transport modes, helping to reduce car trip kilometres. City Plan also advocates the redevelopment of brownfield sites to include both residential and commercial elements. This is shown in the place policies in part 3 of the plan and in policy Econ 5, which provides support for sites to be redeveloped for mixed use development including housing in order to contribute towards meeting the city's housing requirement. Paragraph 3.240 states that small businesses contribute significantly towards the economy of the city by providing jobs and services. The policy aims to help meet the needs of small businesses and the city's residents by ensuring full consideration is given in the design and layout of developments to the retention and inclusion of small business/commercial units within mixed use developments which is a policy approach consistent with the strategy of the City Plan 2030. As a result the Council does not consider the overall car travel impacts of redeveloping existing business or industry sites to be significant. The Council's position is set out in further detail in Issue 3: Delivery of the

Strategy and Issue 35: Economy Policies. **No modification proposed**

Living Streets Edinburgh Group (0486).

One of the key aims of City Plan (CD001) is adopting an “Infrastructure first” approach, directing new development to where there is existing infrastructure. The aim also makes it clear that where required to support new development City Plan requires new and expanded community infrastructure. The potential requirement for new or upgraded infrastructure and any developer contributions required to facilitate these will be assessed during the submission of future subsequent planning applications.

Aim 8 is a short summary of the City Plans key aims. Paragraph 2.30 and policy Inf 10 makes it clear that City Plan reinforces the national sustainable travel hierarchy and walking is promoted first. The Council does not consider that it is necessary to have a definition of walking within the City Plan’s glossary.

If sites indicated in appendix D (CD002) have specific active travel and/or public transport requirements, then these are clearly indicated in the development principles section

The Council considers the wording in Paragraphs 2.118, 2.119 and 2.30 to be suitably robust and will enable decision makers to fully assess and evaluate the impacts of development proposals. **No modification proposed.**

On the 11<sup>th</sup> November 2021, mode share targets were presented to the Council’s Transport and Environment Committee for walking, cycling and public transport. However, these were not approved. Committee acknowledged the complexity of this work and asked officers to engage with key stakeholder groups to review and refine the approach. On the 18<sup>th</sup> of August 2022, the Council’s Transport and Environment Committee produced a Business Bulletin (CD160) which stated that individual mode share targets for walking, cycling and public transport are not supported by stakeholders because this would create undue competition and potentially adversely influence investment levels rather than adopting a more holistic approach, as is provided by the overarching 30% reduction in car kms target.

The approach for setting an overarching target of 30% reduction in car kms without individual mode share targets is consistent with the national and emerging regional policy approach.

If the reporter is so minded then for clarity the wording of paragraph 2.118, 3.193, 3.201, 3.202, 3.204, 3.209, 3.211 and policy Inf 3 could be amended to remove the mention of the Council’s sustainable transport targets (mode share targets) to better reflect the current approach of the Council’s Transport and Environment Committee since the proposed plan was published.

Gavin Cameron (0782)

City Plan (CD001) seeks to ensure the provision and promotion of high quality and readily accessible public transport services and active travel routes.

City Plan proposes a northern orbital bus route (PT1) that will run in relatively close proximity to Cramond, running along Queensferry/Maybury Road. There is also a strategic

active travel project and safeguard proposed. (River Almond Walkway). The Edinburgh Strategic Sustainable Transport Study (ESSTS) (CD071) is also looking at a number of strategic transport corridors which run close to Cramond. The CMP (CD062) also offers a 10 year plan to transform transport in the capital by expanding use of bus, tram, rail, walking and cycling. **No modification proposed.**

Archie Clark (0003)

LEZ's, (Low Emission Zones) and electric vehicle smart charging operates successfully in many cities globally and in the UK, such as London, Birmingham and Glasgow. Edinburgh's city centre LEZ is now in place (implemented 31 May 2022) and will be enforced at the end of the 2 year grace period on 1 June 2024. Trends in vehicle compliance show an improving picture as people get ready for the scheme's operation.

Mobility hubs are one of a number of ways to make sustainable travel more attractive through the provision of accessible, combined shared travel options and other associated facilities such as EV charging. There are many examples of mobility hubs playing an integral part of sustainable city movement in countries across the world. Examples of successful mobility hubs can be found in Vienna, Amsterdam and Austin, Texas.

The COVID-19 pandemic has impacted travel patterns in terms of overall volumes, choice of transport mode and the origin-destination of trips. There is no way of knowing if travel patterns will return to those pre-pandemic levels or if a new 'norm' will be established. Nevertheless, the TA was undertaken using the most robust datasets available and assumed the most likely future traffic scenarios. Official figures by the Office of Rail and Road show that more than double the number of rail journeys were made by passengers between April 2021 and March 2022 compared to the number of those made during the pandemic in the previous year (CD138).

City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram.

One of the key aims of City Plan is to deliver a network of 20 minute neighbourhoods by the creation of high density, mixed use and walkable communities, linked by better active travel and public transport infrastructure. New public transport measures like the tram are less impacted by traffic and congestion and are therefore faster and more reliable. These measures will make people less car dependent and less likely to wish to take the car. It will also help towards the city's target of a reduction in car kilometres.

The Council therefore considers that the City Mobility Plan will widen travel choice and reinforce the national sustainable travel hierarchy that promotes walking, wheeling, cycling, public transport and car sharing in preference to single occupancy car use.

**No modifications proposed.**

Robert Drysdale (0354)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the spatial strategy and allocation of sites included within the Proposed Plan. The approach taken was guided by Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) (CD112). The TA informed the City Plan spatial strategy maps (CD002-006). The Council considers the wording of

paragraph 2.114 to be suitably robust.

'A city where you don't need to own a car to move around' is an accurate summary of one of the City Plans aims. **No modifications proposed**

Crosswind Developments Ltd (0184)

Maps 1 and 8 are small city-wide illustrative maps which cannot be expected to show every aspect of the plan in detail. The larger proposals maps which separately cover the four designated areas of the city are for that purpose. No active travel routes or links in West Edinburgh are shown in map 1 and 8 for this reason, however, the active travel routes and links, like (WE27) is, however, clearly shown in the larger North-West proposals map (CD004), Map 24 and the online interactive mapping system. Map 8 is correctly titled Transport Proposals and Safeguards. Map 9 has a title and a legend and is clearly readable.

Energy and Waste policies are included under this outcome as they are resources and services which are part of the City's essential infrastructure. **No modification proposed.**

Leith Central Community Council (0614)

The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched On Towns and Cities Challenge Fund (CD153).

One of the four key aims of City Plan (CD001) is to limit the requirement for car use as advocated by the National Transport Strategy 2 (NTS 2) (CD110) and the draft National Planning Framework 4 (CD099). City Plan seeks to ensure the provision and promotion of high quality and readily accessible public transport services and active travel routes that will minimise people's requirement to own and utilise a car.

Paragraph 2.30 states that "This will enable us to meet our (Edinburgh's) target for a reduction in car kilometres by 20%". This is in line with the Scottish Government's commitment to a 20% reduction in distance travelled by car by 2030. **No modifications proposed.**

However, on the 11<sup>th</sup> of November 2021, the Council's Transport and Environment Committee approved a citywide target to reduce car kilometres (kms) by 30% by 2030 (CD161). This reflects that Edinburgh is largely a relatively compact urban environment with good public transport and therefore can aim to reduce a greater percentage of car kilometres by 2030, compared to more remote, rural expansive areas of Scotland. If the reporter is so minded then for clarity paragraph 2.30 could be amended to reflect the 30% target approved by the Council's Transport and Environment Committee since the proposed plan was published.

Frances Guy (0589)

One of the four key aims of City Plan is to limit the requirement for car use as advocated by the National Transport Strategy 2 (NTS 2) (CD111) and the draft National Planning Framework 4 (CD099). City Plan seeks to ensure the provision and promotion of high quality and readily accessible public transport services and active travel routes

that will minimise people's requirement to own and utilise a car.

Paragraph 2.30 states that "This will enable us to meet our (Edinburgh's) target for a reduction in car kilometres by 20%". This is in line with the Scottish Government's commitment to a 20% reduction in distance travelled by car by 2030. **No modifications proposed.**

However, on the 11<sup>th</sup> of November 2021, the Council's Transport and Environment Committee approved a citywide target to reduce car kilometres (kms) by 30% by 2030 (CD160). This reflects that Edinburgh is largely a relatively compact urban environment with good public transport and therefore can aim to reduce a greater percentage of car kilometres by 2030, compared to more remote, rural expansive areas of Scotland. If the reporter is so minded then for clarity paragraph 2.30 could be amended to reflect the 30% target approved by the Council's Transport and Environment Committee since the proposed plan was published.

#### Hallam Land Management (0615)

As would be expected the plan has been informed and influenced by regional context and change. Paragraphs 2.26 and 2.114 of the plan makes it clear that the City Mobility Plan (CD062) and other strategic transport strategies will be major influences on the delivery of sustainable transport modes alongside national and regionally focused projects. So too will be progress in delivering committed City Regional Deal funding for WETA refresh 2016 (CD073) and West Edinburgh Transport Improvement Projects (WETIP) (CD072) to address cross boundary transport issues in the West of Edinburgh.

As paragraph 2.23 of the plan makes clear Edinburgh's regional input to the National Planning Framework process have been made through an interim Regional Spatial Strategy approved by the SESplan Joint Committee, the City Regional Deal directors and the constituent SESplan authorities (CD093). It has been a process of collaborative working with the Scottish Government. Paragraph 2.25 states that the collaborative working with Scottish Government and the context of the National Transport Strategy 2 (NTS 2) (CD110) and the Strategic Transport Projects Review 2 (STPR2) (CD111) underpin the opportunities for progress to be made to support better connectivity and access to jobs across the entire region whilst also supporting the transition to net carbon zero movement. NTS2 (CD110) and STPR2 (CD111) have been published by Transport Scotland on their website and have been open for public consultation. Other high-level strategies were also published appropriately e.g. Interim regional spatial strategy and NPF4 consultation process (CD098). These are part of the national and regional context of the plan.

The City Mobility Plan has a section on Covid 19- Impacts and Recovery. The impact that Covid has had on transport demand is also addressed in the TA under section 1.3 The Key Challenges to be Addressed and in the Plausible Future Travel Demand Scenarios.

The Council's detailed response to suggested additional greenfield sites is set out in issue 9

City Plan aims to change travel behaviours by enabling easier access to efficient public

transport and active travel routes and to direct new development to sites which can make best use of these sustainable transport modes. City Plan aims to increase the range of reliable, efficient and convenient active and public transport options. The proposals to enable this is set out in part 4 of the plan. These proposals will not just benefit new developments but will enable Edinburgh to be “A city where you don’t need a car to get around”. These tables were informed by the City Plan TA (CD014), the Edinburgh Strategic Sustainable Transport Study (ESSTS) (CD071) and the City Mobility Plan (CMP) as well as West Edinburgh Transport Appraisal (2016 Refresh) (WETA) and emerging West Edinburgh Transport Improvement Programme (WETIP).

The phasing and programming of development is dependent on the timescales for works beginning on site and the Action Programme is updated yearly. Paragraph 2.17 states that the Strategic Transport Projects Review 2 is still underway. This statement is accurate. **No modification proposed.**

#### Tarmac (0244)

As would be expected City Plan (CD001) has been informed and influenced by regional context and change. Paragraphs 2.26 and 2.114 of the plan makes it clear that the City Mobility Plan (CD0062) and other strategic transport strategies will be major influences on the delivery of sustainable transport modes alongside national and regionally focused projects. So too will be progress in delivering committed City Regional Deal funding for WETA refresh 2016 (CD073) and West Edinburgh Transport Improvement Projects (CD072) to address cross boundary transport issues in the West of Edinburgh.

As paragraph 2.23 of the plan makes clear Edinburgh’s regional input to the National Planning Framework process have been made through an interim Regional Spatial Strategy (CD093) approved by the SESplan joint committee, the City Region Deal joint committee and the constituent SESplan and City Deal authorities. It has been a process of collaborative working with the Scottish Government. Paragraph 2.25 states that the collaborative working with Scottish Government and the context of the National Transport Strategy 2 (CD110) and the Strategic Transport Projects Review 2 (CD111) underpin the opportunities for progress to be made to support better connectivity and access to jobs across the entire region whilst also supporting the transition to net carbon zero movement. NTS2 (CD110) and STPR2 (CD111) have been published by Transport Scotland on their website and have been open for public consultation. Other high-level strategies were also published appropriately e.g. Interim regional spatial strategy and NPF4 consultation process. These are part of the national and regional context of the plan.

City Plan’s spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram. City Plan aims to increase the range of reliable, efficient and convenient active and public transport options. The proposals to enable this is set out in part 4 of the plan. These proposals will not just benefit new developments but will enable Edinburgh to be “A city where you don’t need a car to get around”. These tables were informed by the City Plan TA (CD014), the Edinburgh Strategic Sustainable Transport Study (ESSTS) (CD071) and the City Mobility Plan (CMP) (CD062) as well as West Edinburgh Transport Appraisal (2016 Refresh) (WETA) and emerging West Edinburgh Transport Improvement Programme (WETIP). The Council’s detailed response to suggested

additional greenfield site is set out in issue 9. **No modification proposed.**

Mark Ockendon (0419)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the plan which sets out Edinburgh's mass transit network, including proposed new public transport actions, from the City Mobility Plan (CD062) and the ESSTS (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (NTS2) (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153). The introduction of free public transport is out with the remit of the City Plan.

The Council considers that the current wording of the plan and its policies are robust and will help deliver the aims of the strategy. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306)

Edinburgh City Centre LEZ was approved by Scottish Ministers on 19 May 2022 and was introduced on 31 May 2022. Enforcement will start on 1 June 2024, following a two-year grace period for all. Further details of Edinburgh's proposed mass transit network are available in the City Mobility Plan (CD062) and the Edinburgh Sustainable Strategic Transport Study (CD071). **No modification proposed**

Alasdair Gillies (0035)

City Plan promotes the national sustainable travel hierarchy which is advocated in NTS 2 (CD110) in which walking and wheeling is promoted first. Spaces for People is not part of the City Plan. **No modification proposed.**

Jean Morley (0461)

City Plan (CD001) aims to provide the people of Edinburgh with a greater range of reliable, efficient and convenient active and public transport options. An orbital city bus route is proposed as well as safeguarded routes for future tram lines. A key aim of the plan is also to direct development to where there is existing infrastructure and to deliver a network of 20 minute neighbourhoods. **No modification proposed.**

SEPA (0012)

City Plan (CD001) aims to increase the range of reliable, efficient and convenient active and public transport options not just for new developments but to benefit developments which already exist throughout the City. **No modification proposed.**

Sarah Adamson (0523)

A key outcome of City Plan (CD001) is for Edinburgh to be a City where you don't need to own a car to move around. City Plan intends to provide the people of Edinburgh with a greater range of reliable, convenient and efficient active and public transport options. Another key aim of the plan is to direct development to where there is existing

infrastructure and to deliver a network of 20 minute neighbourhoods. City Plan will help reduce traffic levels and air pollution within the City. **No modification proposed.**

Donald Macaulay (0188)

The maintenance and upkeep of road and pavement infrastructure is out with the scope of the City Plan (CD001). **No modification proposed.**

Genna Spears (0081)

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan (CD001) accords with the CMP (CD062) in terms of managing private car use and public space. Dedicated cycle lanes will encourage the growth of cycling within the City in line with the sustainable transport hierarchy. **No modification proposed.**

Rodger Musson (0162)

One of the four key aims of City Plan (CD001) is to reduce the need for car use as advocated by NTS 2 (CD110) and the draft National Planning Framework 4 (CD099). City Plan seeks to ensure the provision and promotion of high quality and readily accessible public transport services and active travel routes that will minimise people's requirement to own and use a car. Policy Inf 5 states that proposals for major development which would generate a significant travel demand will not be supported where there is a reliance on private car use. **No modification proposed.**

Julie Roberts (0210)

A key outcome of City Plan (CD001) is for Edinburgh to be a City where you don't need to own a car to move around.

City Plan aims to provide the people of Edinburgh with a greater range of reliable, efficient and convenient active and public transport options. An orbital city bus route is proposed as well as safeguarded routes for future tram lines. The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153). **No modification proposed.**

Dandara East Scotland (0757)

One of the four key aims of City Plan (CD001) is to reduce the need for car use as advocated by NTS 2 (CD110) and the draft National Planning Framework 4 (CD099). City Plan seeks to ensure the provision and promotion of high quality and readily accessible public transport services and active travel routes that will minimise people's requirement to own and use a car. The Council's position relative to parking requirements is set out in Issue 32: Transport Policy-Parking. **No modification proposed.**

**Action Programme.**

Hallam Land Management (0599), Miller Homes (0649), CALA Management Ltd (0465).



The Action Programme (CD008) is about actions to deliver the plan's policy and proposals. It does not set out the delivery mechanism and funding of developers or registered social landlords. The action programme is not guidance on developer contributions.

The content of the Action Programme is set out by legislation (Section 21 of Part 2 of the Planning Scotland 2006 Act (CD153) and Town and Country Planning (Scotland) Regulations 2008, Part 5, section 26: Form and Content of Action Programmes (CD154). It states that an action programme is to set out the following matters-

- (a) a list of actions required to deliver each of the policies and proposals contained in the relevant plan (b) the name of the person who is to carry out each such action; and (c) the timescale for the conclusion of each such action.'

The evidence base for the TA (CD014) and the WETA 2016 refresh (CD073) has some high level costings of some actions but it is not a legislative requirement to include costs in an action programme. Circular 6/2013 (CD121) mentioned relates to legal agreements. Policy Inf 3 relates to infrastructure delivery and developer contributions. Paragraph 3.197 of the plan states that planning guidance will set out the mechanism for the detailed calculation of proportionate contributions within a contribution zone, as well as any exceptions.

Phasing of development has a dependency on landowner and developer decisions and timings. Therefore, the specifics of timing of infrastructure provision, where required, are part of planning application considerations. Most will be delivered with development and so will follow the delivery and phasing timescale of development at project level. Where development has a dependency on infrastructure provision that will be part of the project level considerations these will be controlled by conditions on the application. Subsequent action programmes will be updated to provide more detail on delivery timescales, as development proposals come forward and are continually informed by the pace of housing completions as evidenced by the Council's annual housing land audit and completions programme. The Council's strategy is likely to be delivered within the timeline of the plan. The Council is setting out clearly in the Action Programme (CD008) and the City Plan what the infrastructure requirements are to support development. Developers need to use this information to inform their layout designs (for transport infrastructure) and to make appropriate financial plans and decisions. There is a clear link between the action in the Action Programme and the proposed plan given that most have a City Plan reference which relates to the part 4 proposals section in the proposed plan and the tables of proposals for the various types of infrastructure. **No modification proposed.**

#### Cramond & Barnton Community Council (0243)

Adopting an infrastructure first approach, one of the City Plan 2030 aims, requires being upfront in the Action Programme (CD008) and in the proposed plan about what infrastructure is required to support and mitigate the impact of development, and to be directing/planning development where infrastructure capacity exists.

However, it is important that infrastructure is delivered timeously to mitigate negative impacts and to facilitate sustainable behaviour (in the case of, for example, Active Travel and Public Transport) and this will be dealt with either in subsequent action programmes (informed by HLACP, with Council programmes for delivery of infrastructure and/or in planning applications and associated legal agreements where the phasing of infrastructure

is tied to the completion rates of development. **No modification proposed.**

#### Tarmac (0244)

The annually updated Action Programme (CD008) will highlight the actions required to deliver the public transport and active travel improvements proposed within or around the area in the plan, which includes Ratho. Most of the phasing and programming of approved development in West Edinburgh will be delivered under project level decisions with development and so will follow the delivery and phasing timescale of development. Subsequent action programmes will provide more information on delivery timescales as development proposals come forward and are continually informed by the pace of housing completions as evidenced by the Council's annual housing land audit and completions programme. **No modification proposed.**

#### SEPA (0012)

Support Noted.

### **Transport Appraisal**

#### Hallam Land Management (0615)

One of the key aims of City Plan (CD001) is that by 2030 Edinburgh will be a city where you don't need to own a car to move around. Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. City Plan also promotes an infrastructure first approach to community development, directing development to where there is existing infrastructure. The TA (CD014) informed the spatial strategy of the proposed plan and the infrastructure proposals as set out in part 4 of the plan to deliver the strategy and policy outcomes. Tables 3- 10 of the plan lists a number of developments that will help improve active and public transport throughout the City.

The TA and the plan both refer to and take into account potential changing travel patterns as a result of Covid-19. No evidence of changing travel patterns as a result of covid was presented in Choices as it was published pre-pandemic on 31<sup>st</sup> January 2020. **No modification proposed.**

#### Tarmac (0244)

The Council commissioned a TA, (produced by Jacobs) (CD014) to inform the spatial strategy of the plan. The strategy is supported by the Scottish Governments National Transport Strategy 2 (CD110) and the emerging Strategic Transport Projects Review 2 (CD111), which supports investment in public transport.

The TA looks at the effects of traffic demand scenarios. It includes pre-covid or no covid scenarios, plausible post covid without policy changes and plausible post covid with policy changes and proposed mitigation measures of proposed development sites. No evidence of changing travel patterns as a result of covid was presented at choices as choices was published pre-pandemic on 31<sup>st</sup> January 2020.

City Plan aims to change travel behaviours by enabling easier access to efficient public transport and active travel routes and to direct new development to sites which can make best use of these transport modes. New technologies like electric vehicles are being provided for and the existing trams line is being extended and the plan includes safeguards for the potential north- south tram routes noted in table 10 of the plan. Tables 3, 4, 5, 6, 7, 8, 9 and 10 of the Plan list a number of proposed infrastructure interventions for improvement of active and public travel throughout the City. These have been informed by the TA, the City Mobility Plan (CD062), ESSTS (CD071) as well as WETA 2016 Refresh (CD073) and WETIP (CD072). The Council's position relative to the revised vision for West Edinburgh is set out in detail in issue 39. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

The Transport Appraisal (TA) (CD014) informs the spatial strategy of the Proposed Plan and therefore it was required to assess both the 'preferred approach' and the 'reasonable alternatives' approach of Choices for City Plan, the Main Issues Report (MIR) stage of the plan process (CD022). There are sites included and indicated in the TA that were assessed as "reasonable alternatives" that are not in the proposed plan. **No modification proposed**

Inverdunning (Hatton Mains Ltd) (0427)

The Council commissioned a Transport Appraisal (TA), (produced by Jacobs) (CD014) to inform the spatial strategy and allocation of sites included within the Proposed Plan. The approach taken was guided by Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) (CD112). The wording of paragraph 2.112 clearly articulates the established aims of the plan.

The TA has taken trip rates directly from appropriate West Edinburgh Transport Assessments and other data sources. Generally, Census Travel to Work modal splits are more appropriate than TRICS modal splits for residential trip rates as they relate directly to the location in question and provide a more accurate reflection of the specific characteristics of each area. Mode split assumptions also reflect the ambition for West Edinburgh, with high public transport and active travel use.

The COVID-19 pandemic has impacted travel patterns in terms of overall volumes, choice of transport mode and the origin-destination of trips. There is no way of knowing if travel patterns will return to those pre-pandemic or if a new 'norm' will be established. Nevertheless, the TA was undertaken using the most robust datasets available and assumed the most likely future traffic scenarios. A key requirement in the delivery of West Edinburgh will be the monitoring of mode shares as the build out proceeds, with the package of interventions and supporting measures (e.g. parking restraint) refined as part of each subsequent planning application. Whilst it is acknowledged that COVID has had a significant impact on travel behaviours there has been a significant return to normal with public transport patronage now at approximately 80-85% of 2019 values. Even without COVID, the strategic model is a tool useful in illustrating potential future outcomes. COVID amplifies uncertainty; however, results are framed around a robust framework, encouraging active travel and public transport modes.

Modelling reflects an agreed policy compliant scenario. The City of Edinburgh Council,

Transport Scotland and the National Government have policies which seek to reduce vehicle kilometres, supporting wider emissions and climate change targets.  
(CD110)(CD114)

It is recognised that trip distribution within the strategic model will not reflect the change in travel patterns resulting from COVID. Even so, the model is the best tool available to test development proposals and to understand their potential impact. As noted above, monitoring of development traffic and emerging mode shares will be critical. Future development phases will be adapted to deliver against transport and wider policy targets as necessary.

The TA established trip rates using two different approaches, both of which follow standard methodology. One using the trip rates in the associated development TAs, and a second using rates derived from the strategy model. Values were similar when parking restraint was assumed. Generally, lower trip rates reflect the ambition to provide more sustainable travel choices along with a low parking and low traffic environment.

H59 to H63 are mixed use sites. The trip rates were derived using standard methodology, extracted from the relevant development TA or the strategic model. Sites H59 to H63 departure and arrival volumes reflect the development mixes provided. It is acknowledged that development proposals will evolve, reflecting future market conditions.

Key public transport and active travel interventions along the A8/A89 corridor between Broxburn and Maybury are being delivered through WETIP (CD072). There are a number of infrastructure elements that could have a direct bearing on the delivery of the West Edinburgh masterplan; however, individual elements of the plan can be adjusted to reflect real-world infrastructure delivery. City Plan 2030 is the Local Development Plan for a ten year period in order to reflect development in the near future. This reduces the level of uncertainty concerning traffic volumes and travel behaviours in the short to medium term.

The Council's position in relation to suggested additional greenfield sites is set out in further detail in issue 9. **No modification proposed.**

(0465) CALA Management Ltd, (0599) Hallam Land Management, (0649) Miller Homes Limited

The TA (CD014) that supports City Plan was undertaken based on guidance from Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) (CD112). Evidence to inform the decision making process was appraised against a common set of aspirational Transport Planning Objectives and used a range of traffic modelling tools.

CEC's VISUM Strategic Model of Edinburgh was used in the supporting the TA to assess multiple travel modes, including highway, bus, rail and tram public transport. Recently used to forecast future patronage on the tram line as part of the Trams to Newhaven full business case, this multi-modal traffic model is considered the most robust transport tool available to appraise the options under review in the Proposed LDP.

Robust 'off the shelf' modelling tools for active travel are less common than for public transport and private vehicles. Therefore, trip generation for active travel was based on

published Transport Assessments of specific developments or data on trip patterns of similar sites elsewhere in the UK. Appraisal of active travel interventions relied on data from best practice which identifies what could be expected if high quality new active travel infrastructure is provided on urban corridors which currently have no dedicated provision. Although total active travel volumes may not be known, these modes are at the top of the sustainable travel hierarchy and at the forefront of local and national government policy. Therefore provision of quality active travel infrastructure at new development sites is a priority.

Lothian Buses already provide a Airlink 100 route from the City Centre to the Airport, via a number of stops which include Drum Brae South, Edinburgh Zoo, Western Comer, Murrayfield and Wester Coates before arriving at several City Centre stops. The Airlink 100 service operates 24/7 and departs Edinburgh Airport every 30 minutes between 0100-0430 and then every 10 minutes between 0430-0100.

There is also the Skylink 200 (Airport to Ocean Terminal via North Edinburgh) service. This service has numerous stops which includes Clermiston, Blackhall, Drylaw, Muirhouse, West Pilton, Granton, Starbank, Newhaven, Lindsay Road and then Ocean Terminal. The Skylink 200 leaves Edinburgh Airport every 30 minutes between 0410-0000,

The Skylink 400 (Airport to Fort Kinnaird via South Edinburgh) service also has numerous stops which includes Gyle Centre, Edinburgh Park, Wester Hailes, Gillespie Crossroads, Colinton, Oxbgangs, Fairmilehead, Kaimes, Gracemount, Royal infirmary and Fort Kinnaird. The Skylink 400 departs up to every 30 minutes between 0420-2335.

Additional patronage will need to be served but will add to the demand for these services and future enhancement of them. The detail of this is subject to collaborative working with Lothian Buses and other public transport operators. Further details will be published in the action programme. The routing of these buses and other future services will respond to the patronage created and the final approved access and movement arrangements for the development. The tram route proposals shown in table 7 are currently safeguards. The plan notes that the Edinburgh Strategic Sustainable Transport Study Phase 2 shows alignment options for the Granton to City Centre extension and the South East corridor options, being taken forward to a Strategic Business Case.

The majority of interventions summarised in Table 8 were costed as part of the WETA 2016 Refresh (CD073). Interventions are being further refined as part of the development of a detailed masterplan for West Edinburgh. This is being informed by ongoing discussions with landowners and public transport operators.

Road improvements given in Table 9 are generally being delivered through existing Section 75 agreements or are being proposed to unlock development in West Edinburgh. The Sheriffhall junction upgrade is being funded through the Edinburgh and South East Scotland City Region Deal (CD162). All of the proposals have a title and description. Table 10 only highlights safeguards.

The 20 minute neighbourhoods approach is set out in the draft NPF4 (CD099) and the 2021 Programme for Government (CD100). It is a well- established approach used worldwide as a way of delivering services within communities. Further details of the Council's position on 20 minute neighbourhoods is set out in issue 28.

Paragraph 5.6.2 of the Transport Impact Assessment in the TA clearly identifies that City Plan 2030: IBG2 – revised proposals incorporating 7,000 residential units with a reduced office use element from the previous proposals. The purpose of a TA is to inform the spatial strategy of the Proposed Plan and therefore it was required to assess both the ‘preferred approach’ and the ‘reasonable alternatives’ approach of Choices for City Plan, the Main Issues Report (MIR) stage of the plan process (CD022). Chapter 4.2 of the TA states that In order to ensure a robust assessment is undertaken, and following advice from CEC, the demand associated with Option 3 (brownfield / greenfield blend) is considered within this Transport Appraisal. The Council is not required to assess the impact of all proposed sites on the existing road network.

The TA does establish transport mitigation measures for West Edinburgh which have been incorporated into part 4 of the plan as well as those proposed by the WETA 2016 refresh (CD073). Further details of these measures will be expected with the future masterplan and with future detailed planning applications.

It must also be acknowledged that the potential transport aspects of a site being developed is only one part of the considerations that have been assessed through the city plan process. The Council’s position on the plan’s spatial strategy can be seen in issue 2. Allocation of sites is addressed in issue 20. **No modification proposed.**

#### Liberton & District Community Council (0084)

The TA (CD014) was carried out through modelling and analysis using the CEC VISUM strategic model which is focused on Edinburgh and key arterial corridors. It also covers all major commuting catchments to the city and strategic movements from the rest of Scotland. Road and rail links across the whole of mainland Britain, necessary to allow traffic to travel to/from the study area are also included. City Plan policies Inf 3 and Inf 4 require cumulative and cross boundary transport impacts to be addressed. Paragraph 3.59 states that it is expected that detailed transport assessments will be submitted in support of development proposals and that these should include modelling of the cumulative effects of increased traffic flows on trunk and local road networks taking into account all known proposed development and any potential cross-boundary impacts. **No modification proposed**

#### **West Edinburgh Transport**

#### Royal Highland & Agricultural Society of Scotland (0482)

Paragraph 3.59 states that a cumulative Transport Contribution Zone will be applied to address the area wide transport interventions as identified through the TA (CD014) and the outcomes of WETA/WETIP (CD073 & CD072), in support, of the measures being delivered as part of the City Deal (CD162), including those in part 4, table 8. Table 8 clarifies that the table comprises the list of necessary transport proposals to support the development envisaged for place 16 West Edinburgh, as set out in the development principles. It includes measures identified in the WETA 2016 Refresh.

The wording of paragraph 3.59 is robust and proportional. The West Edinburgh Development Principles states that a collaborative, multi-disciplinary, master plan led approach will be required in principle. A gravity model for development in the area has

been created and will be used to inform guidance on developer contributions. This will inform the assessment of cumulative impacts for each development for the purposes of developer contributions. **No modifications proposed.**

#### Living Streets Edinburgh Group (0486)

Criterion (g) of the West Edinburgh Development Principles state that a legible hierarchy of streets, routes and spaces designed for convenient, safe movement of pedestrians, cyclists and public transport that connects all parts of the brief area. Criteria (u)- (z) also highlight the requirements in principle of active and public transport within these sites. Paragraph 3.57 also makes it clear that the Council will coordinate a collaborative, multidisciplinary master plan approach to development across these sites. The plan reflects the aims of Scottish Planning Policy (CD096) and the National Transport Strategy 2 (CD110). **No modification proposed.**

#### Transport Scotland (0480)

City Plan (CD001) has a number of measures highlighted in table 8 which will mean that developments will be required to be designed to provide for an influence a modal shift to sustainable travel modes.

The plan confirms, under the West Edinburgh Design Principles that a collaborative, multi-disciplinary masterplan approach will be required. Criterion (m) and (n) of the West Edinburgh Design Framework confirm that master plan and phasing work should address the potential for local access to the south of the area to the A8 in conjunction with transport and traffic improvements on the A8 as well as a design, parking strategy and parking standards approach.

Further, Policy Inf 4 states that “Development proposals relating to housing or other development sites which would generate a significant amount of trips, shall demonstrate through an appropriate transport assessment or statement, and proposed mitigation that

- (a) Identified\* local, city-wide and cross boundary individual and cumulative transport impacts can be timeously addressed where this is relevant and necessary for the proposal.”

The policy also confirms that the identified transport proposals in part 4, tables 3-10 and interventions set out in the place policies take into account the cumulative impact with other sites in the plan, from the Transport Appraisal modelling and analysis (CD014). This policy requires that proposals carry out further assessment at the planning application stage to further inform any local impacts and to take into account the impact of any windfall sites progressed through the housing policies.

Policy Inf 3 also states that development will be supported where there is sufficient infrastructure capacity available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. Proposals will be required to deliver or contribute to the following infrastructure provision where relevant and necessary to mitigate any negative impact (either on an individual or cumulative basis) and to ensure that the proposal can meet the Council’s sustainable transport targets and where commensurate to the scale of the development:

- (a) Transport proposals and safeguards form part 4, tables 3-10 and/or interventions identified in transport assessments and/or transport consultations in accordance with policy Inf 4.

Further information on WE30 is provided in the City Plan Action Programme (CD008). This will be annually updated. **No modification proposed.**

Joint representation made by Crosswind Developments Ltd (0184), Edinburgh Airport Limited (0761), West Town Edinburgh Ltd (0660).

The indicative arrangements identified on the Proposals Map, Map 1, Map 2, Map 8 and Map 24 have been informed by the TA commissioned for the City Plan by Jacobs (CD014) as well as the WETA 2016 Refresh (CD073), WETIP (CD072), ESSTS (CD071) and CMP (CD062).

The airport link road is included in City Plan under reference WE 27 WE28 and WE 29 in table 8.

The Council acknowledges that there are misalignments in terms of the Gogar Link Road as shown on the north-west proposals map and that shown in map 24 (West Edinburgh). However, as the joint representation notes, these maps and the road layouts shown within them are indicative.

The maps produced for the Plan also contain different road alignments from those indicated under the WETA 2016 Refresh. This is due to the further transport, design and environmental assessments which have been undertaken in relation to the landholdings since 2016. It must be acknowledged that the vision for West Edinburgh has been revised since the WETA 2016 Refresh plans were produced, this including the decommissioning of the former Crosswinds runway in 2018, with major proposals now coming forward to redevelop this land.

The Council recognises that there are a range of constraints in the area of the Gogar Burn and Castle Gogar Estate, both relating to environmental considerations and land ownership, which will have a significant bearing to where new road alignments and related infrastructure can be reasonably located. City Plan Map 24 sought, as far as possible, to acknowledge these various constraints.

The route of the Gogar Link Road as shown in the proposals map is not dissimilar to that shown in the WETA 2016 Refresh maps, which were themselves also indicative. Layouts and road alignments within the sites would only become fully established in the required future multi-disciplinary collaborative masterplans and at the project level stage. There is further work being carried out as a collaborative process to establish the best detailed approach. The Council considers that the Reporter may wish to take account of ongoing work to further inform their recommendations.

The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes, will be vital to ensure that this, large, complex area, which has the complications of multiple land ownerships should be brought forward in a cohesive and planned way. This will ensure that the plan's vision for West Edinburgh to become a vibrant, high density, mixed-use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape



framework, stated in paragraph 3.56 of the plan, can be delivered. The wording of criteria l, m, n, and o, in the West Edinburgh Development Principles should remain.

The joint representation for the movement and access framework plan proposed by Crosswind Developments Ltd, Edinburgh Airport Limited and West Town Edinburgh Ltd demonstrates collaborative working albeit it proposes amending what is set out in City Plan. Assessment of this by the Council's consultants demonstrates that whilst for private car movements there is no significant difference there are concerns around the effect on public transport and active travel provision as provided for by the Place 16 approach in map 24.

The Council also notes that the Airport Link Road (the northern alignment) seems substantially based on the Airport Eastern Access Road proposal (Application reference:- 21/00217/FUL) (CD165) which is currently subject to call-in by Scottish Ministers. The routing of the Gogar Link Road (the southern alignment) could have an adverse impact to environmental features which form part of the Castle Gogar Estate. Elements of the eastern part of this alignment to the north of Myreton Drive also seem to reflect the Airport Eastern Access Road proposal and Crosswinds masterplan proposals, both of which are currently subject to Scottish Ministerial call-in.

The Council continues to work on a review of the West Edinburgh Strategic Design Framework (CD070) as a means to updating and refining the transport and other aspects of master planning this area. It aims to complete this process in the short term. As noted above, the Reporter may wish to consider updates from this work.

The Council's approach has been to set out connectivity in the area which takes account of all the previous work done. The Council's position is that the indicative mapping shows a structure that would give the right public transport and active travel connectivity in addition to sufficient provision for other traffic movements. The Council continues to work collaboratively with stakeholders to reach agreement on a transport structure that would continue to provide the required level of connectivity for all modes. As noted above that work continues and will inform the review of the West Edinburgh Strategic Design Framework, including master planning to ensure a cohesive vision for West Edinburgh can be delivered.

The errata only deals with the alignment of the orbital bus route (CD007). **No modification proposed.**

Crosswind Developments Ltd. (0184), Edinburgh Airport Limited (0761)

The route of the Gogar Link Road as shown in the proposals map is not dissimilar to that shown in the WETA 2016 Refresh maps (CD073), which were themselves also indicative. Layouts and road alignments within the sites would only become fully established in the required future multi-disciplinary collaborative masterplans and at the project level stage. There is further work being carried out as a collaborative process to establish the best detailed approach. The Council considers that the Reporter may wish to take account of ongoing work to further inform their recommendations.

The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes, will be vital to ensure that this, large, complex area, which has the complications of multiple land ownerships should be

brought forward in a cohesive and planned way. This will ensure that the plan's vision for West Edinburgh to become a vibrant, high density, mixed-use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered. No evidence has been provided to support the statement that the collaborative masterplan approach proposed would cause delays to development. The wording of criteria l, m, n, and o, in the West Edinburgh Development Principles should remain.

The joint representation for the movement and access framework plan proposed by Crosswind Developments Ltd, Edinburgh Airport Limited and West Town Edinburgh Ltd demonstrates collaborative working albeit it proposes amending what is set out in City Plan. Assessment of this by the Council's consultants demonstrates that whilst for private car movements there is no significant difference there are concerns around the effect on public transport and active travel provision as provided for by the Place 16 approach in map 24.

The Council also notes that the Airport Link Road (the northern alignment) seems substantially based on the Airport Eastern Access Road proposal (Application reference:- 21/00217/FUL) (CD165) which is currently subject to call-in by Scottish Ministers. The routing of the Gogar Link Road (the southern alignment) could have an adverse impact to environmental features which form part of the Castle Gogar Estate. Elements of the eastern part of this alignment to the north of Myreton Drive also seem to reflect the Airport Eastern Access Road proposal and Crosswinds masterplan proposals, both of which are currently subject to Scottish Ministerial call-in.

The Council continues to work on a review of the West Edinburgh Strategic Design Framework (CD070) as a means to updating and refining the transport and other aspects of master planning this area. It aims to complete this process in the short term. As noted above, the Reporter may wish to consider updates from this work.

The Council's approach has been to set out connectivity in the area which takes account of all the previous work done. The Council's position is that the indicative mapping shows a structure that would give the right public transport and active travel connectivity in addition to sufficient provision for other traffic movements. The Council continues to work collaboratively with stakeholders to reach agreement on a transport structure that would continue to provide the required level of connectivity for all modes. As noted above that work continues and will inform the review of the West Edinburgh Strategic Design Framework, including master planning to ensure a cohesive vision for West Edinburgh can be delivered.

The road and mixed use development proposed under applications 20/03219/PPP (CD166) and 21/00217/FUL (CD167) are, at the time of writing, with the Scottish Ministers for their consideration. It would therefore not be appropriate to currently highlight these in map 24. Depending on their determination, they may need to be identified in future masterplans for the sites.

The indicative arrangements identified on the Proposals Map, Map 1, Map 2, Map 8 and Map 24 have been informed by the TA (CD014) commissioned from Jacobs for City Plan as well as the WETA 2016 Refresh, WETIP (CD072), ESSTS (CD071) and CMP (CD062).

The airport link road is included in City Plan under reference WE 27, WE28 and WE 29 in

table 8. Map 1 is a high level indicative map and it is not possible to indicate all proposed active travel safeguard routes at this scale. Maps 1 and 2 are of appropriate quality given their size and scale. The errata only deals with the alignment of the orbital bus route (CD007). **No modification proposed.**

#### West Town Edinburgh Ltd (0660)

The indicative arrangements identified on the Proposals Map, Map 8 and Map 24 have been informed by the Transport Appraisal (CD014) commissioned for the City Plan by Jacobs as well as the WETA 2016 Refresh (CD073) and the ESSTS (CD071).

The airport link road is included in City Plan under WE 27, WE 28 and WE 29.

Map 1 is a high level indicative map and it is not possible to indicate all proposed active travel safeguard routes at this scale. Maps 1 and 2 are of appropriate quality given their size and scale. They do not require modification.

The Council acknowledges that there are misalignments in terms of the Gogar Link Road as shown on the north-west proposals map and that shown in map 24 (West Edinburgh). However, these maps and the road layouts shown within them are indicative.

The maps produced for the Plan also contain different road alignments from those indicated under the WETA 2016 Refresh. This is due to the further transport, design and environmental assessments which have been undertaken in relation to the landholdings since 2016. It must be acknowledged that the vision for West Edinburgh has been revised since the WETA 2016 Refresh plans were produced, this including the decommissioning of the former Crosswinds runway in 2018, with major proposals now coming forward to redevelop this land.

The Council recognises that there are a range of constraints in the area of the Gogar Burn and Castle Gogar Estate, both relating to environmental considerations and land ownership, which will have a significant bearing to where new road alignments and related infrastructure can be reasonably located. City Plan Map 24 sought, as far as possible, to acknowledge these various constraints.

The route of the Gogar link Road as shown in the proposals map is not dissimilar to that shown in the WETA 2016 Refresh maps, which were themselves also, indicative. Layouts and road alignments within the sites would only become fully established in the required future multi-disciplinary collaborative masterplans and at the project level stage. There is further work being carried out as a collaborative process to establish the best detailed approach. The Council considers that the Reporter may wish to take account of ongoing work to further inform their recommendations.

The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes, will be vital to ensure that this, large, complex area, which has the complications of multiple land ownerships should be brought forward in a cohesive and planned way. This will ensure that the plan's vision for West Edinburgh to become a vibrant, high density, mixed-use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered. The wording of criteria l. m. n. and o. in the West Edinburgh Development Principles should remain.

The joint representation for the movement and access framework plan proposed by Crosswind Developments Ltd, Edinburgh Airport Limited and West Town Edinburgh Ltd demonstrates collaborative working albeit it proposes amending what is set out in City Plan. Assessment of this by the Council's consultants demonstrates that whilst for private car movements there is no significant difference there are concerns around the effect on public transport and active travel provision as provided for by the Place 16 approach in map 24.

The Council also notes that the Airport Link Road (the northern alignment) seems substantially based on the Airport Eastern Access Road proposal (Application reference:- 21/00217/FUL) (CD165) which is currently subject to call-in by Scottish Ministers. The routing of the Gogar Link Road (the southern alignment) could have an adverse impact to environmental features which form part of the Castle Gogar Estate. Elements of the eastern part of this alignment to the north of Myreton Drive also seem to reflect the Airport Eastern Access Road proposal and Crosswinds masterplan proposals, both of which are currently subject to Scottish Ministerial call-in.

The Council continues to work on a review of the West Edinburgh Strategic Design Framework (CD070) as a means to updating and refining the transport and other aspects of master planning this area. It aims to complete this process in the short term. As noted above, the Reporter may wish to consider updates from this work.

The Council's approach has been to set out connectivity in the area which takes account of all the previous work done. The Council's position is that the indicative mapping shows a structure that would give the right public transport and active travel connectivity in addition to sufficiently provide for other traffic movements. The Council continues to work collaboratively with stakeholders to reach agreement on a transport structure that would continue to provide the required level of connectivity for all modes. As noted above that work continues and will inform the review of the West Edinburgh Strategic Design Framework, including master planning to ensure a cohesive vision for West Edinburgh can be delivered.

The Council's response to representations relating to developer contributions and Inf 3 can be found in issue 30: Infrastructure delivery- Transport. **No modification proposed.**

#### West Craigs Limited (0472)

It is acknowledged in the errata that the alignment as shown on the proposal map is incorrect, and the orbital bus route is proposed to instead travel to the west of HSG19, over a new proposed bus / active travel bridge (proposal WE12) through Gogar and Maybury before travelling along Maybury Road. City Plan makes it clear that this is only a potential option. The route shown is indicative only.

The Gogar Link Road (T9) allocation in the current LDP has been modified. However, a primary vehicle route is still clearly shown in map 24 of the plan and its route is still proposed to run from the tram depot and will provide access to H62. It is also clearly shown in table 8 of the plan under WE28 and WE29. **No modification proposed.**

#### Rosebery Estate (Bankhead) (0618)

The objection to WE12 is noted. WE12 is identified in City Plan only as a potential option.  
**No modification proposed**

Lynn Grattage (0362)

The ongoing WETIP work (CD072) is appraising WE5. It is considering how the additional lane would be delivered along with a segregated cycle lane. **No modification proposed**

NatureScot (0528)

Paragraph 2.118 confirms that to deliver in line with the sustainable transport hierarchy, the Council want to see all development; prioritise walking, wheeling and cycling, demonstrate high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs.

The West Edinburgh Design Principles highlight a number of requirements in principle relating to active and public transport within West Edinburgh. It also states the requirements in principle are for a collaborative, multi-disciplinary, master plan approach. Paragraph 3.59 states a cumulative Transport Contribution Zone will be applied to address the area wide transport interventions identified through the TA (CD014) and the outcome of WETA/WETIP (CD073) & (CD072) in support of the measures being delivered as part of City Deal (CD162), including those in part 4, Table 8 of the plan. **No modification proposed**

Murrayfield Community Council (0146), Juniper Green and Baberton Mains Community Council (0306), Archie Clark (0003), Cramond and Barnton Community Council (0243)

The Council commissioned a TA, (produced by Jacobs) (CD014) to inform the spatial strategy and allocation of sites included within the Proposed Plan.

Chapter 6.18 of the TA states that of all the proposed City Plan 2030 development sites/clusters, West Edinburgh has received most consideration in this TA, on account of the scale of development and complexity of the nearby transport system. The road network in this part of Edinburgh is already congested at peak periods, and previous work has been undertaken to investigate the transport implications of potential developments in the area, not least the West Edinburgh Transport Appraisal refresh of 2016 (WETA) (CD073).

Modelling work carried out as part of the TA tested the revised proposals for the West Edinburgh area, which have a greater proportion of residential development than had previously been assessed in WETA. However, the modelling work showed that the total volume of additional vehicular trips generated in both cases (under WETA and West Edinburgh proposals) is broadly similar, but the directional flow of them is different. The accessibility analysis underpins the need both to improve active and public transport facilities, to ensure that a wide range of new services are available on site to minimise residents' need to travel elsewhere, and for strong demand restraint measures for private car use. The TA recommends a number of measures to mitigate the risk of greater general traffic growth than that identified under the WETA 2016 refresh. These have been incorporated into the West Edinburgh Development Principles and transport improvements which are set out in table 8 of the plan which also includes measures identified in the

WETA 2016-Refresh. Transport Scotland has not objected to the proposed plan. Paragraph 3.59 states a cumulative Transport Contribution Zone will be applied to address the area wide transport interventions identified through the TA and the outcome of WETA/WETIP (CD073)&(CD072) in support of the measures being delivered as part of City Deal (CD162), including those in part 4, Table 8 of the plan. Place 16 also confirms that the Council will coordinate a collaborative, multidisciplinary master plan approach to development across the sites. Table 2 of the plan also makes it clear that development in sites H59-62 should accord with the West Edinburgh Development Principles set out in place 16.

The tram route is already located through the West Edinburgh site with the location and base for a new station and crossing points in place. It forms a key part of the strategy. Further potential tram routes have been safeguarded in the plan.

Paragraph 3.224 relates to Waste Disposal Sites and does not mention road capacity. Proposed road improvements around the Gogar roundabout (R5) are designed primarily to assist bus movement. **No modification proposed**

The Council considers that the glossary is suitably thorough. No modification is proposed, however should the reporter be minded the glossary could be updated to include CPZ, WETA, WETIP and City Deal to provide more clarity.

The Council acknowledges that the use of a colon in criterion t (a) of West Edinburgh Design Principles is a technical error. This should be considered as a minor drafting matter.

#### Grange/Prestonfield Community Council (0192)

Mobility hubs are proposed through-out the city as part of the Action programme (CD008). Table 8 of City Plan indicates West Edinburgh mobility hubs WE39 and WE40. **No modification proposed**

#### Ratho and District Community Council (0289)

Paragraph 3.58 of City Plan states that development should only progress subject to sufficient infrastructure already being available or when it is demonstrated that it can be delivered as part of a phased approach to site delivery. The West Edinburgh Development Principles highlights active travel, public transport and private transport mitigation principles for West Edinburgh and these are set out on table 8 of the Plan. WE15 and WE21 are currently being appraised as part of WETIP (CD072). The request for significant consultation on WE19/20 is noted. **No modification proposed**

#### Simon Hindshaw (0095) Alasdair Gillies (0035) Spokes Lothian (0545)

The West Edinburgh Transport Improvement measures identified in table 8: WE6, WE12, WE16, WE23, WE27 AND WE28, have been informed by the TA (CD014) and includes measures identified in the WETA 2016 Refresh (CD073) and WETIP (CD072) as a number of necessary infrastructure interventions required to support major development in West Edinburgh and to encourage a shift to sustainable travel, which shall help reduce levels of congestion and pollution.

WE6 is potentially to be superseded by the Maybury junction upgrade and Maybury Road feasibility study to be considered as part of the strategic appraisal of the orbital bus route with actions and resources provided by the Bus Partnership Fund (CD168).

WE16 will come to the outskirts of Cramond at the junction of Maybury Road and Queensferry Road. WE13, WE16 and the existing tram route offer public transport to Edinburgh Park. The request that active travel and public transport improvements be enacted before the intelligent traffic signals proposed at WE38 is noted. Intelligent traffic signals can also be utilised to prioritise public and active travel modes. **No modification proposed**

#### Hallam Land Management (0615), Tarmac (0244)

The Council commissioned a TA, (produced by Jacobs) (CD014) to inform the spatial strategy and allocation of sites included within the Proposed Plan.

Chapter 6.18 of the TA states that of all the proposed City Plan 2030 development sites/clusters, West Edinburgh has received most consideration in this Transport Appraisal, on account of the scale of development and complexity of the nearby transport system. The road network in this part of Edinburgh is already congested at peak periods, and previous work has been undertaken to investigate the transport implications of potential developments in the area, not least the West Edinburgh Transport Appraisal refresh of 2016 (WETA) (CD073).

Modelling work carried out as part of the TA tested the revised proposals for the West Edinburgh area, which have a greater proportion of residential development than had previously been assessed in WETA. However, the modelling work showed that the total volume of additional vehicular trips generated in both cases (under WETA and West Edinburgh proposals) is broadly similar, but the directional flow of them is different. The accessibility analysis underpins the need both to improve active and public transport facilities, to ensure that a wide range of new services are available on site to minimise residents' need to travel elsewhere, and for strong demand restraint measures for private car use. The TA recommends a number of measures to mitigate the risk of greater general traffic growth than that identified under the WETA 2016 refresh. These have been incorporated into the West Edinburgh Development Principles and transport improvements which are set out in table 8 of the plan which also includes measures identified in the WETA 2016 Refresh and WETIP. Transport Scotland has not objected to the proposed plan. **No modification proposed.**

#### Corstorphine Community Council (0799)

The West Edinburgh Development Principles includes requirements in principle for active travel, public transport and private transport for West Edinburgh. However, further details on parking and traffic management and mitigations shall be produced in the required future masterplan process and when planning applications are submitted for assessment. The masterplan process and the detailed assessment of future applications will ensure that the sites are accessible, inclusive and comply with the Equalities Act. Paragraph 2.82 states that the planning system should ensure that development does not lead to harmful increases in air pollution, particularly in Air Quality Management Areas (AQMA's) or lead

to the creation of further AQMA's in the city. Paragraph 2.83 states that the Council monitors air quality in other locations and may need to declare further AQMA's. Policy Env 34 sets out requirements in relation to air quality amongst other matters. In the course of a planning application the Council can consult with appropriate consultees to establish if/when further work is needed to support an application and assess compliance with this policy. **No modification proposed.**

#### Network Rail (0071)

The West Edinburgh Transport Improvement measures identified in table 8, have been informed by the TA (CD014) and includes measures identified in the WETA 2016 Refresh (CD073) as a number of necessary infrastructure interventions required to support major development in West Edinburgh and to encourage a shift to sustainable travel. Table 8 identifies a number of improvements that are proposed like WE8, WE12 and WE15 to provide greater active travel and public transport facilities to the railway stations. No improvements to the stations themselves are proposed in the plan and it is noted that Network Rail have not stated any specific modifications. Further discussions can be carried out with Network Rail during the masterplan process and through the assessment of any future submitted planning application. Paragraph 3.59 states that it is expected that detailed transport assessments will be submitted in support of development proposals. **No modification proposed.**

#### Anna Goodwin (0302)

It must be acknowledged that each planning application is different and every planning application is determined on its own individual merits. The Council considers the wording of paragraph 3.59 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

#### Michael Ramsay (0011)

Paragraph 3.57 of the plan states that a West Edinburgh Master Plan will be prepared. This will consider traffic assessments and consideration of infrastructure. Paragraph 3.59 of the plan states that it is expected that detailed transport assessments will be submitted in support of development proposals. **No modification proposed.**

#### Pawel Stankiewicz (0445)

The current layout indicated in map 24 of the plan has been informed by the TA (CD014) and ongoing programmes like WETIP (CD072). **No modification proposed.**

#### Liberton & District Community Council (0084), Edinburgh Access Panel (0620)

Support noted.

### **INF 4: Provision of Transport Infrastructure.**

West Town Edinburgh Ltd, (0660) Edinburgh Airport Limited (0761), Crosswind Developments Ltd (0184).

Policy Inf 4 does not state that a transport assessment, which assesses cumulative



transport impacts, will be required with every application relating to housing or other development sites which would generate a significant amount of trips. Criterion (a) of Inf 4 states that Identified\* local, city-wide and cross boundary individual and cumulative transport impacts can be timeously addressed where this is, relevant and necessary for the proposal.

Policy Inf 4 also has an asterisk to further explain that the identified transport proposals in part 4, tables 3-10 and interventions set out in the place policies take into account the cumulative impact with other sites in the plan, from the TA modelling and analysis (CD014).

The wording of the Inf 4 is suitably robust whilst also acknowledging that every application is unique and is determined on its own merits. As such, a degree of flexibility in the wording is required when utilised in the assessment of an application.

The Council's detailed response to representations relating to infrastructure delivery-transport can be found in issue 30. **No modification proposed.**

(0404) Homes for Scotland, (0078) Wright PDL, (0677) Barratt David Wilson Homes

Policy Inf 3 states in paragraph 3.198 that it is the Council's preference that infrastructure is directly delivered by developers where possible. In most cases this will be possible where the land is in the control of the developer or the Council. Where an off-site action is needed on land not controlled by the Council or is an action that addresses cumulative impacts of more than one development, proportionate developer contributions will be sought. The council is committed to ensuring that sites are delivered in a strategic joined up manner not in isolation. **No modification proposed.**

Ratho and District Community Council (0289)

City Plan clearly states in paragraph 3.58 that development should only progress subject to sufficient infrastructure already being available or when it is demonstrated that it can be delivered as part of a phased approach to site delivery.

Inf 4 establishes that Development proposals relating to housing or other development sites which would generate a significant amount of trips, shall demonstrate through an appropriate transport assessment or statement and proposed mitigation that

- (a) Identified local, city-wide and cross boundary individual and cumulative transport impacts can be timeously addressed where this is relevant and necessary for the proposal and,
- (b) Any required transport infrastructure in place policies or development principles to be prepared has been addressed where relevant to the proposal.

**No modification proposed.**

West Town Edinburgh Ltd (0660)

Supports in terms of approach to developer contributions noted.

Mrs Patricia Scott (0349), SEPA (0012), Liberton & District Community Council (0084), Grange/Prestonfield Community Council (0192), Katherine Kennedy (0569),

Support noted.

## **INF 5- Location of Major Traffic Generating Development**

Hallam Land Management (0615) Tarmac (0244)

The Council commissioned a TA, (produced by Jacobs) (CD014) to inform the spatial strategy and allocation of sites included within the Proposed Plan. The plan directs development to brownfield sites in the urban area or in strategic expansion areas where there is good public transport including tram. The Council's detailed position in terms of the spatial strategy is set out further in issue 2.

The TA looks at the effects of traffic demand scenarios. It includes pre-covid or no covid scenarios, plausible post covid without policy changes and plausible post covid with policy changes and proposed mitigation measures of proposed development sites.

It must be acknowledged that each planning application is different and every planning application is determined on its own individual merits. The Council considers the wording of policy Inf 5 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. The Council's response to representations relating to proposed greenfield sites can be found in section 9. **No modification proposed.**

Steve Loomes (0767), Wright PDL (0078), Homes For Scotland (0404), Barratt David Wilson Homes (0677), Avison Young for Aldi Stores Ltd (0526), Miller Homes Limited (0649), Hallam Land Management (0599), Living Streets Edinburgh Group (0486), Cockburn Association (0777)

It must be acknowledged that each planning application is different and every planning application is determined on its own individual merits. The Council considers the wording of policy Inf 5 to be sufficiently robust whilst still providing the decision maker a degree of flexibility when accessing a planning application. **No modification proposed.**

Cynthia Shuken (0632)

The Council considers the wording of Inf 5 to be robust and will ensure that the aims of the strategy are delivered. The Council's detailed position on active travel can be found in issue 33: Transport Proposals-Active Travel. The Council's detailed position on the Transport Strategy can be found in Issue 31: Transport Strategy. The Council's detailed position on Infrastructure Delivery- Community Facilities can be found in Issue 28. **No modification proposed.**

SEPA (0012), Liberton & District Community Council (0084), Katherine Kennedy (0569)

Support Noted

## **INF 11: Public Transport Proposals and Safeguards, Table 6, Table 7 & Table 10**

Hallam Land Management (0615),

The TA (CD014) has informed the spatial strategy of the plan and the proposals set out in

part 4 of the plan, which includes infrastructure proposals to deliver the strategy and policies. The Council considers that the public transport strategy and proposed infrastructure are clearly stated throughout the plan. Paragraph 2.112 of the plan states that City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram. The Council's response to representations relating to proposed greenfield sites can be found in section 9. The Council considers the wording of policy Inf 11 to be robust and will ensure the delivery of the strategy.

As paragraph 2.23 of the plan makes clear Edinburgh's regional input to the National Planning Framework process have been made through an interim Regional Spatial Strategy approved by the SESplan Joint Committee, the City Regional Deal directors and the constituent SESplan authorities (CD093). It has been a process of collaborative working with the Scottish Government. Paragraph 2.25 states that the collaborative working with Scottish Government and the context of the National Transport Strategy 2 (CD110) and the Strategic Transport Projects Review 2 (CD111) underpin the opportunities for progress to be made to support better connectivity and access to jobs across the entire region whilst also supporting the transition to net carbon zero movement. NTS2 and STPR2 have been published by Transport Scotland on their website and have been open for public consultation. Other high-level strategies were also published appropriately e.g. Interim regional spatial strategy and NPF4 (CD098) consultation process. These are part of the national and regional context of the plan.

**No modifications proposed.**

#### Bo Adams (0363)

The Road Improvements proposed in table 9 of the City Plan have been informed by the City Plan TA (CD014), ESSTS (CD071), CMP (CD062), WETA Refresh 2016 (CD073), WETIP (CD072) and the Sheriffhall project led by Transport Scotland. The Roads Authority should be contacted in relation to concerns relating to the positioning of existing bus stops. **No modifications proposed.**

#### National Galleries of Scotland (0725)

Safeguarded active travel routes are highlighted so that land owners know the Council's aspirations. Further information in relation to the Council's position in terms of CPO powers, can be viewed in issue 3. **No modifications proposed.**

#### Tarmac (0244)

The TA (CD014) has informed the spatial strategy of the plan and the proposals set out in part 4 of the plan, which includes infrastructure proposals to deliver the strategy and policies. The Council considers that the public transport strategy and proposed infrastructure are clearly stated throughout the plan. Paragraph 2.112 of the plan states that City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram. The Council's response to representations relating to proposed greenfield sites can be found in section 9. The Council considers the wording of policy Inf 11 to be robust and will ensure the delivery of the strategy. **No modifications proposed.**

#### Simon Hindshaw (0095)

The TA (CD014) has informed the spatial strategy and allocation of sites included within the Proposed Plan with the aim of achieving the City Plan key outcomes, one of which is to be able to get around the city without owning a car.

The criticism of Edinburgh's existing tram programme is noted. The Council prioritises walking and cycling in accordance with the national transport hierarchy. Many of the proposals highlighted in part 4 of the plan are to prioritise buses. The future railway infrastructure improvements are currently safeguards. **No modification proposed.**

Louise Baker (0773)

City plan (CD001) proposes that orbital bus routes will provide linkages to more peripheral areas around Edinburgh. Mobility hubs are also proposed which shall provide better linkages between different transport modes, including bus and tram. The future railway infrastructure improvements are only safeguards at the moment. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

The detail of the proposed orbital bus routes is ongoing and is subject to collaborative working with Lothian buses and other public transport operators. Further details will be published in the action programme. The routing of these buses and other future services will respond to the patronage created and the final approved access and movement arrangements for the development. **No modifications proposed.**

Archie Clark (0003)

The City Plan 2030 Action programme (CD008) provides further details with regards to the Strategic Active Travel Projects and Safeguards. It will be annually updated. The maps included within the TA are suitably detailed.

Comments relating to Edinburgh's existing tram programme are noted. The Tram route Proposals and Option Safeguards have been informed by the City Plan TA (CD014) and the ESSTS (CD071). **No modification Proposed.**

Robert Drysdale (0354)

The alignment and routing of the Tram Route Proposal and Option Safeguard (Table 7) and Public Transport- Other Safeguard (Table 10) have been informed by the ESSTS (CD071), CMP (CD062) and the City Plan TA (CD014). The current wording makes clear the intent of the policy. Maps 1 and 2 indicate the layout of the tram routes and safeguards highlighted in table 7 and 10.

In preparing Choices for City Plan (CD022) and the City Mobility Plan, the Council commissioned an Edinburgh Strategic Sustainable Transport Study (Phase 1). Choices for City Plan stated that City Plan 2030 will identify new transport infrastructure, including public transport and road infrastructure improvements that will be required to support the growth of the city, based on a Transport Appraisal, and actions arising from the City Mobility Plan. These actions will be set out in City Plan 2030's proposed Action

Programme (CD008) and will include the extension of the tram network. The City Plan 2030 Action Programme included safeguard option B2 (Tr3). **No modification proposed.**

University of Edinburgh (0464)

The University's support is noted as well as the view that careful consideration is required to achieve a suitable balance of public transport infrastructure with the unique character of Edinburgh City Centre and to balance this with key areas of public realm and movement / connectivity, especially where tram infrastructure could introduce unwelcome impacts or barriers to permeability. Further dialogue will take place if any safeguard options impact upon the landownership of the University of Edinburgh estate. **No modification proposed.**

Cramond & Barnton Community Council (0243) Mrs Patricia Scott (0349)

The alignment and routing of PT6 has been informed by the City Plan TA (CD014). The ESSTS (CD071) notes that there are strategic Transport Corridors within proximity of Barnton and Cramond and that strategic corridor interventions will be under consideration in Transport Scotland's Strategic Transport Projects Review 2 (CD111). **No modification proposed.**

Friends of Cammo (0387)

Map 1 is a high level indicative map and it is not possible to indicate all proposed active travel safeguard routes at this scale. Maps 1 and 2 are of appropriate quality given their size and scale. **No modification proposed.** However, should the Reporter be so minded a legend could be attached to maps 1 and 2 for clarity.

NatureScot (0528)

The alignment and routing of the North and South Orbital and their links with active travel routes have been informed by the ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073), WETIP (CD072) and the City Plan TA (CD014). Mobility hubs are also proposed throughout Edinburgh which shall provide better linkages between different transport modes, including bus and tram. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd.(0427)

The spatial strategy and public transport proposals highlighted in table 6 and 8 have been informed by the ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073), WETIP (CD072) and the City Plan TA (CD014). The Council's detailed response to suggested additional greenfield site is set out in issue 9. **No modification proposed.**

Alasdair Gillies (0035)

The alignment and routing of PT6 have been informed by the ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073), WETIP (CD072) and the City Plan TA (CD014). . The ESSTS notes that there are strategic Transport Corridors within proximity of Barnton

and Cramond and that strategic corridor interventions will be under consideration in Transport Scotland's Strategic Transport Projects Review 2. **No modification proposed.**

Ratho and District Community Council (0289)

The City Plan proposed action programme (CD008) currently states that the proposed orbital bus routes will be delivered with development and in collaboration with Lothian Buses. The action programme and the timescales for the delivery of PT6 will be updated annually once the City Plan has been adopted. **No modification proposed.**

Jean Morley (0461)

The alignment and routing of the orbital bus routes have been informed by the ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073), WETIP (CD072) and the City Plan TA (CD014). The ESSTS notes that there are strategic Transport Corridors within proximity of Barnton and Cramond and that strategic corridor interventions will be under consideration in Transport Scotland's Strategic Transport Projects Review 2. **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Lynn Grattage (0362) The Davidson's Mains and Silverknowes Association (0454)

Orbital bus routes are shown in City Plan maps. The alignment and routing of orbital bus routes have been informed by the ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073), WETIP (CD072) and the City Plan TA (CD014). It is proposed that the orbital bus routes link with active travel mobility hubs. **No modification proposed.**

Lady Road Investment S.A.R.L. (0625)

TR6 is an existing safeguard which has been carried over from the existing Local Development Plan and has been in place for a number of years. Any future development proposal at Cameron Toll would have to acknowledge the existing safeguard and show how it would not be compromised. Discussions between the Council and future developers of the site would be encouraged at the pre-application stage. **No modification proposed.**

Miller Homes Limited and Wheatlands Farming Partnership (0592)

The Tram route Proposals and Option Safeguards have been informed by the ESSTS (CD071), CMP (CD062) and the City Plan TA (CD014). The spatial strategy has also been informed by the City Plan TA. The Council's detailed response to suggested additional greenfield sites is set out in issue 9. **No modification proposed.**

Alan Stevens (0646), B Hyland (0792), Sustrans (0561), Alistair Mackintosh (0650), C van der Dussen (0558), Claire Graf (0541), Connie Longmate (0707), Hannah Knechtli, (0259), Jakub Szwedowicz (0547), Joseph Coulson (0017), Katarzyna Wozniak (0546), Jordan Thomson (0676), Kasper Schwartz (0576), Fraser Wilson (0536), Despoina Papadopoulou (0575), Hannah Coulson (0331), Mark Beaumont (0752), Peter Moonlight (0550), Sandra Labinjoh (0690), Sophia Lycouris (0667), Graham Jones (0340), Mattia Ventre (0763), Catherine Labinjoh (0711), Andrew Longmate (0705), Heather Duque

(0746), Patrick Longmate (0708), Gareth Wheeler (0636), Katherine Kennedy (0569), Heather R Finnegan (0664), Zuleika Connolly-Jones (0656), James McMeekin (0631)

Tr 2 Safeguard option B1b is an existing safeguard which is carried over from the existing Edinburgh Local Development Plan (T1) and was approved by the Parliament (Tram Line 1 Act 2006) (CD126). It is prudent for the existing safeguard to be retained within City Plan as the Edinburgh Strategic Sustainable Transport Study Phase 2 has not yet been taken forward to a Strategic Business Case. **No modification proposed.**

John Yellowlees (0024)

The Tram Route Proposals and Option Safeguards have been informed by the City Plan TA (CD014) and the ESSTS (CD071). The comments made are noted. The Strategic Sustainable Transport Study Phase 2 has not yet been taken forward to a Strategic Business Case. No decision has yet been made on final routes. Tr 2 Safeguard option B1b is an existing safeguard which is carried over from the existing Edinburgh Local Development Plan (CD039). **No modification proposed.**

John Watt (0321)

Support for the Tram Route Proposal and Option Safeguards (TR8) and (TR10) is noted. TR8 is proposed to terminate at Sheriffhall Junction. Sheriffhall Junction improvements (R10) is a project ran by Transport Scotland, which aims to include active travel provision and operational benefits for public transport. Newbridge Roundabout improvements (R9) aim to involve intelligent traffic signal interventions which seek to prioritise public transport.

The Tram Route Proposals and Option Safeguards have been informed by the City Plan TA (CD014) and the ESSTS (CD071). The comments made are noted. The Strategic Sustainable Transport Study Phase 2 has not yet been taken forward to a Strategic Business Case. No decision has yet been made on final routes.

The requirement for park and rides at these locations have not been identified. Congestion charging is out with the remit of the City Plan. **No modification proposed.**

Shawfair LLP (0258)

The safeguarded tram route line indicated out with the City of Edinburgh Council boundary is noted as being illustrative. **No modification proposed.**

Spokes Lothian (0545), Peter Brown (0672), Suzanne McIntosh (0409), Theo Spanellis (0415) Peter Allen (0336) Capital Rail Action Group (0789)

The Tram Route Proposals and Option Safeguards have been informed by the City Plan TA (CD014), the CMP (CD062) and the ESSTS (CD071). The comments made are noted. The ESSTS Phase 2 has not yet been taken forward to a Strategic Business Case. No decision has yet been made on final routes. These proposals and options are only safeguards. Full details of the active travel and tram routes cannot be expected at this stage. **No modification proposed.**

Robert Falcon (0640)

Table 10 only shows other public transport safeguards. Full details of the works required to enable passenger use of the stations proposed to be opened would be provided at the project level stage. **No modification proposed.**

Mr Cuchulainn Gent (0047)

The Council believes that City Plan is ambitious and will ensure that the future growth of the City is sustainable and net-zero. The active travel plans have been informed by the City Plan TA (CD014) and the CMP (CD062). The ESSTS phase 2 is being taken forward to a strategic business case. Full details of the works required to enable passenger use of the stations proposed to be opened would be provided at the project level stage. **No modification proposed.**

Grange/Prestonfield Community Council (0192)

The comments are noted. The Tram Route Proposals and Option Safeguards have been informed by the City Plan TA (CD014), the CMP (CD062) and the ESSTS (CD071). **No modification Proposed.**

Transport Scotland (0480).

The Public Transport- Other Safeguards shown in table 10 have been informed by the City Plan TA (CD014), the CMP (CD062) and the ESSTS (CD071). . They are also long standing safeguards which are present within the current LDP. **No modification Proposed.**

Mike Richardson (0109)

The alignment and routing of orbital bus routes have been informed by the ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073), WETIP (CD072) and the City Plan TA (CD014). **No modification proposed**

Miller Homes Limited. (0256)

The proposals set out in the tables contained within part 4 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). City Plan has not identified Riccarton Village as a proposed housing development site. The Council's response to proposed additional greenfield sites is covered in detail in issue 9. **No modification proposed.**

SEPA (0012), West Town Edinburgh Ltd (0660), Michael Ramsay (0011), Network Rail (0071), Portobello Amenity Society (0612).

Support Noted.

**INF 13: Road Network Infrastructure & Table 9**

Edinburgh Airport Limited (0761)



The indicative arrangements identified on the Proposals Map, Map 8 and Map 24 have been informed by the TA (CD014) commissioned for the City Plan by Jacobs as well as the WETA 2016 Refresh (CD073), WETIP (CD072), CMP (CD062) and the ESSTS (CD 071).

The airport link road is included in City Plan under reference WE 27 WE28 and WE 29 in table 8.

The Council acknowledges that there are misalignments in terms of the Gogar Link Road as shown on the north-west proposals map and that shown in map 24 (West Edinburgh). However, these maps and the road layouts shown within them are indicative.

The maps produced for the Plan also contain different road alignments from those indicated under the WETA 2016 Refresh. This is due to the further transport, design and environmental assessments which have been undertaken in relation to the landholdings since 2016. It must also be acknowledged that the vision for West Edinburgh has been revised since the WETA 2016 Refresh plans were produced, this including the decommissioning of the former Crosswinds runway in 2018, with major proposals now coming forward to redevelop this land.

The Council recognises that there are a range of constraints in the area of the Gogar Burn and Castle Gogar Estate, both relating to environmental considerations and land ownership, which will have a significant bearing to where new road alignments and related infrastructure can be reasonably located. City Plan Map 24 sought, as far as possible, to acknowledge these various constraints.

The route of the Gogar Link Road as shown in the proposals map is not dissimilar to that shown in the WETA 2016 Refresh maps, which were themselves also, indicative. Layouts and road alignments within the sites would only become fully established in the required future multi-disciplinary collaborative masterplans and at the project level stage. There is further work being carried out as a collaborative process to establish the best detailed approach. The Council considers that the Reporter may wish to take account of ongoing work to further inform their recommendations.

The Council maintains that a collaborative, multidisciplinary, masterplan approach for development, including new roads and active travel routes, will be vital to ensure that this, large, complex area, which has the complications of multiple land ownerships should be brought forward in a cohesive and planned way. This will ensure that the plan's vision for West Edinburgh to become a vibrant, high density, mixed use extension to the city with a focus on place-making, sustainability, connectivity biodiversity and a strong landscape framework, stated in paragraph 3.56 of the plan, can be delivered.

The joint representation for the movement and access framework plan proposed by Crosswind Developments Ltd, Edinburgh Airport Limited and West Town Edinburgh Ltd demonstrates a degree of collaborative working albeit it proposes amending what is set out in City Plan. Assessment of this by the Council's consultants demonstrates that whilst for private car movements there is no significant difference there are concerns around the effect on public transport and active travel provision as provided for by the Place 16 approach in map 24.

The Council also notes that the Airport Link Road (the northern alignment) seems

substantially based on the Airport Eastern Access Road proposal (Application reference:- 21/00217/FUL) (CD165) which is currently subject to call-in by Scottish Ministers. The routing of the Gogar Link Road (the southern alignment) could have an adverse impact to environmental features which form part of the Castle Gogar Estate. Elements of the eastern part of this alignment to the north of Myreton Drive also seem to reflect the Airport Eastern Access Road proposal and Crosswinds masterplan proposals, both of which are currently subject to Scottish Ministerial call-in.

The Council continues to work on a review of the West Edinburgh Strategic Design Framework (CD070) as a means to updating and refining the transport and other aspects of master planning this area. It aims to complete this process in the short term. As noted above, the Reporter may wish to consider updates from this work.

The Council's approach has been to set out connectivity in the area which takes account of all the previous work done in this area. The Council's position is that the indicative mapping shows a structure that would give the right public transport and active travel connectivity in addition to sufficient provision for other traffic movements. The Council continues to work collaboratively with stakeholders to reach agreement on a transport structure that would continue to provide the required level of connectivity for all modes. As noted above that work continues and will inform the review of the West Edinburgh Strategic Development Framework, including master planning to ensure a cohesive vision for West Edinburgh can be delivered. **No modification proposed.**

Bo Adams (0363), Spokes Lothian (0545) Miller Homes Limited and Wheatlands Farming Partnership (0592)

The Road Improvements proposed in table 9 of the City Plan have been informed by the City Plan TA (CD014), ESSTS (CD071), CMP (CD062), WETA Refresh 2016 (CD073), WETIP (CD072) and the Sheriffhall project led by Transport Scotland. **No modification proposed.**

Miller Homes Limited and Wheatlands Farming Partnership (0592)

The Council's detailed response to suggested additional greenfield sites is set out in issue 9. **No modification proposed.**

Corstorphine Community Council (0799)

Paragraph 3.214 makes it clear that additional capacity on the road network for private car use is not supported. The wording of policy Inf 13 also states that development will not be supported where it would prejudice new proposed transport infrastructure and junction improvements listed in part 4. **No modification proposed.**

West Town Edinburgh Ltd (0660)

The West Edinburgh Development Principles state that the requirements in principle for H63 is a collaborative, multi-disciplinary master plan led approach instead of a site specific approach which may not produce an integrated road network infrastructure.

The Council considers the wording of Inf 13 to be robust and it could be suitably utilised in the assessment of large scale, masterplan developments. **No modification**

**proposed.**

Mrs Patricia Scott (0349), Mr John G. Skinner (0065), Leonard Wallace (0314), The Davidson's Mains and Silverknowes Association (0454), Jean Morley (0461), Gavin Cameron (0782)

The Road Improvements R8, has been informed by the City Plan TA (CD014). Concerns that changes proposed under (R8) must reflect the safety of residents on both sides of the road to get in and out of their drives safely is noted. **No modification proposed.**

Forth Ports Limited (0496)

R1 (New Street in Leith Docks) is an existing Transport Proposal and Safeguard in the existing LDP under reference T14. (New Street in Leith Docks) That R1 crosses the operational port estate is noted. **No modification proposed.**

Network Rail (0071)

Concerns relating to development potentially resulting in the increased use of level crossings is acknowledged and the Council is open to further dialogue with Network Rail. If a proposed development was to be sited close to the railway or a junction then Network Rail would be consulted as part of the assessment of an application as would the Roads Authority. Weekly lists would also provide Network Rail the opportunity to make comment on an application, which would then be addressed in the report of handling. Inf 4 confirms that development proposals relating to housing or other development sites which would generate a significant amount of trips would require a transport assessment or statement and proposed mitigation to show that identified local, city-wide and cross boundary individual and cumulative transport impacts can be timeously addressed where this is relevant and necessary for the proposal. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003), Cramond & Barnton Community Council (0243)

The Road Improvements proposed in table 9 of the City Plan have been informed by the City Plan TA (CD014), the City Plan 2030 Action Programme (CD008), WETA Refresh 2016 (CD073), WETIP (CD072) and the Sheriffhall project led by Transport Scotland. Works already carried out to roads are out with the remit of City Plan.

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP in terms of managing private car use and public space. **No modification proposed.**

Cramond & Barnton Community Council (0243)

Paragraph 2.82 states that the planning system should ensure that development does not lead to harmful increases in air pollution, particularly in Air Quality Management Areas (AQMA's) or lead to the creation of further AQMA's in the city. Paragraph 2.83 states that the Council monitors air quality in other locations and may need to declare further AQMA's. Policy Env 34 sets out requirements in relation to air quality amongst other matters. In the course of a planning application the Council can consult with appropriate

consultees to establish if/when further work is needed to support an application and assess compliance with this policy. **No modification proposed.**

SEPA (0012).

Concerns noted. **No modification proposed**

Grange/Prestonfield Community Council (0192), Mike Richardson (0109), Liberton & District Community Council (0084), Katherine Kennedy (0569)

Support Noted.

#### **INF 14: Rail Freight**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Comments noted. Table 10 has been informed by the City Plan TA (CD014) and the City Plan 2030 Action Programme (CD008). **No modification proposed.**

Forth Ports Limited (0496)

EW 1d is an existing safeguard for a waste management facility incorporating thermal treatment with energy recovery, within the 2016 LDP (CD039), for a waste management facility incorporating thermal treatment with energy recovery. Policy Inf 14 states that the re-designation of Leith Docks for industrial purposes assumes that a rail-sea freight transfer capability will be retained. It is prudent to retain the waste management safeguard as it reflects the current Council waste management strategy and National Waste Strategy (CD115) and thus the second sentence of paragraph 3.215, which reads “Keeping a reduced general freight rail head to the east in Seafield will complement the safeguard for a waste management facility in that location (see Policy Inf 18)” should be retained. **No modification proposed.**

Network Rail (0071), SEPA (0012), Grange/Prestonfield Community Council (0192)

Support Noted.

#### **INF 15: Edinburgh Airport Public Safety Zones**

SEPA (0012), Grange/Prestonfield Community Council (0192)

Support Noted.

#### **Reporter’s conclusions:**

#### **Reporter’s recommendations:**

<b>Issue 32</b>	<b>Transport Policy-Parking</b>			
<b>Development plan reference:</b>	Part 3: Pages 127- 130	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Alasdair Gillies (0035)  Aldi Stores Ltd. (0526)  Ambassador Group (0683)  Andy Agnew (0562)  Andy Inglis (0138)  Archie Clark (0003)  Barratt David Wilson Homes (0677)  BDW Trading (0350)  Cockburn Association (0777)  CoMoUK (0728)  Cramond &amp; Barnton Community Council (0243)  Crosslane Co-Living SPV 2 Limited (0687)  Crosswind Developments Ltd. (0184)  Dandara East Scotland. (0757)  Dave Berry (0463)  Deirdre Hutchinson. (0285)  Dr Patricia Roche (0281)  Ernest Evans (0053)  Friends of Cammo (0387)  Gareth Hutchinson (0290)  Gordon McKay Brown (0573)  Grange &amp; Prestonfield Community Council (0192)  Homes for Scotland (0404)  HUB Residential (0582)  Jean Morley (0461) </td> <td> Juniper Green &amp; Baberton Mains Community Council. (0306)  Katherine Kennedy (0569)  Leith Central Community Council (0614)  Liberton &amp; District Community Council (0084)  Lidl (0181)  Living Streets Edinburgh Group (0486)  Lynn Grattage (0362)  Mark Ockendon (0419)  Michael Ramsey (0011)  Mr John G. Skinner (0065)  Peter Brown (0672)  Prof. Rustam Salman (0207)  SEPA (0012)  Sergey Gorobets (0414)  Steve Loomes (0767)  Stewart Milne Homes (0118)  Stirling Developments Limited. (0303)  Transform Scotland (0595)  Taylor Wimpey (0200)  Union Property Services Ltd/VRS Ltd (0584)  Watkin Jones Group (0516)  Wright PDL (0078) </td> </tr> </table>			Alasdair Gillies (0035) Aldi Stores Ltd. (0526) Ambassador Group (0683) Andy Agnew (0562) Andy Inglis (0138) Archie Clark (0003) Barratt David Wilson Homes (0677) BDW Trading (0350) Cockburn Association (0777) CoMoUK (0728) Cramond & Barnton Community Council (0243) Crosslane Co-Living SPV 2 Limited (0687) Crosswind Developments Ltd. (0184) Dandara East Scotland. (0757) Dave Berry (0463) Deirdre Hutchinson. (0285) Dr Patricia Roche (0281) Ernest Evans (0053) Friends of Cammo (0387) Gareth Hutchinson (0290) Gordon McKay Brown (0573) Grange & Prestonfield Community Council (0192) Homes for Scotland (0404) HUB Residential (0582) Jean Morley (0461)	Juniper Green & Baberton Mains Community Council. (0306) Katherine Kennedy (0569) Leith Central Community Council (0614) Liberton & District Community Council (0084) Lidl (0181) Living Streets Edinburgh Group (0486) Lynn Grattage (0362) Mark Ockendon (0419) Michael Ramsey (0011) Mr John G. Skinner (0065) Peter Brown (0672) Prof. Rustam Salman (0207) SEPA (0012) Sergey Gorobets (0414) Steve Loomes (0767) Stewart Milne Homes (0118) Stirling Developments Limited. (0303) Transform Scotland (0595) Taylor Wimpey (0200) Union Property Services Ltd/VRS Ltd (0584) Watkin Jones Group (0516) Wright PDL (0078)
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<b>Provision of the development plan to which the issue relates:</b>	Inf 6, Inf 7, Inf 8, Inf 9, Inf 12.			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>General Parking Comments</b></p> <p><u>Gareth Hutchinson (0290)</u></p> <p>Permit parking proposals are another revenue making scheme for the tram network with a complete disregard for local residents. The spaces for people programme is a debacle and there is no easy way of crossing the city with poor public transport.</p>				

The disused inner railway line should be used. Residents should not be penalised without providing the infrastructure first.

Deirdre Hutchinson (0285).

The introduction of permit parking particularly in St Clair Street would just be a tax on residents. There are no parking issues in this street.

Dr Patricia Roche (0281)

Objects to the proposed Controlled Parking Zones at Tower Place, Leith. Removing parking potential for all of the above will seriously and negatively impact on the quality of life of all residents of Queens Quay, residents of adjacent residential blocks and public access to the Shore.

Furthermore, the plan to impose Parking Zone permits is entirely unnecessary. Parking access at Tower Place is not misused. It is a vital and well-appreciated facility that allows the user-friendly, relaxed and commercially important atmosphere of the Shore to be supported and maintained. The instructions for consulting on the process are difficult to follow and unacceptable.

Sergey Gorobets (0414)

Objects to proposed Controlled Parking zones. Instead, the city needs to make the public transport better in all aspects and make the city safe to cycle around. Most people would rather take a bus or bike if it is possible, easy and safe. Penalising the locals for the city's failures by parking charges is not a solution.

Actually, in some areas, parking restrictions are generating a loss, paid by the taxpayer, as the streets are empty. The Council pushes all the cars from the streets of the privileged few at taxpayer's expense, while making the other streets busier. That must be contrary to the Code of Ethics.

Alasdair Gillies (0035)

There is a major problem with lack of car parking at the main Edinburgh hospital. By placing the hospital at one side of the city (and move more services there – e.g. sick kids, eye hospital) you have to appreciate that public transport or walking / cycling simply isn't a credible transport option for very many people.

## **Inf 6- Cycle Parking**

Watkin Jones Group (0516)

Cycle parking targets should be more informed. The current cycle parking standards for housing and student accommodation are onerous and have the potential to result in large areas of inactive frontages on the ground floor of buildings, where more family friendly flats, DDA flats, or alternative ground floor uses could be better located. If the cycle parking is not within the building it will be located externally which can also reduce the area of useable amenity space.

The 100% cycle parking provision for student accommodation is not guaranteed to

translate into 100% cycle usage as many students will also travel by alternative means such as walking or public transport.

#### Cramond & Barnton Community Council (0243)

Secure and readily accessible storage and e-charging facilities should not just be provided for cyclists, but importantly also for electric wheelchairs, mobility scooters and similar devices used by less mobile residents, especially in care home, retirement home and other accommodation used by people with mobility impairments.

#### Aldi Stores Ltd (0526)

Concerns raised about the levels of cycle parking set out which are considered unrealistic and unfeasible for a food retailer to provide. It is unclear from the guidance whether e-bike charging stations are required for employees, customers, or both. There would be significant practical challenges in providing this, not only for customers but also for staff.

Positioning cycle spaces closer than any parking spaces is at times not feasible, especially if cycle spaces would need to be closer than accessible vehicle parking spaces.

### **Inf 7- Private Car Parking**

#### Archie Clark (0003)

Is this statement realistic? "Within the Council's Low Emission Zone private car parking (other than accessible spaces) will not be permitted." It may seem a good objective but is unlikely to help the aim of Edinburgh having a vibrant city centre if people cannot be attracted to reside there.

What is meant by 'accessible spaces' or 'accessible parking'? They are not defined.

Settlements require car parking so "providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries" as Crewe Road South proposals (p57) is insufficient. Shops also need parking for passing trade and for the receipt and distribution of goods. The free parking in Biggar is a good example of what can be achieved with people popping in for items and driving off again. That should be possible in Edinburgh.

#### Mark Ockendon (0419)

INF 7 is hugely prejudiced in general and should be revised throughout. The aim is to reduce carbon emissions, which can be achieved with EV and other low-zero-carbon vehicles.

It is lazy thinking to presume against specific modes of transport like the car, which shall continue to be required. We should focus on the problem - reducing carbon emissions, increasing mobility and convenience - and there are a range of ways this can be addressed.

We should encourage the uptake of electric vehicles, which directly reduce emissions. Edinburgh is woefully behind other cities and other countries in providing EV charging points and this should be a major focus. If an alternative is good enough, people will use it

naturally. An Electric Vehicle Strategy should be further developed with specific focus on expanding the network of EV charging points.

Taylor Wimpey (0200), BDW Trading (0350), Stewart Milne Homes (0118)

This policy is excessively prescriptive, particularly criterion (h).

Ambassador Group (0683)

This is a highly restrictive policy on the provision of private parking spaces, particularly considering the Proposed Plan has a desire to have mixed and multi-generational communities. Large numbers of households will require the use of a private car, and this parking policy will not encourage the mixed communities that the plan is targeting.

Juniper Green & Baberton Mains Community Council.(0306)

The statement “Within the Council’s Low Emission Zone private car parking (other than accessible spaces) will not be permitted.” is not realistic and probably contrary to the aim of a vibrant city centre if people cannot be attracted to reside there.

Lidl (0181)

The wording of the policy (from “The appropriate level of provision...” onwards) is poorly worded and does not provide any clear guidance to potential developers/occupiers of units as to the appropriate level of parking that would be acceptable. This creates an unnecessary level of uncertainty.

It is not clear from the wording of the policy whether the third sentence refers to development of the type identified in the immediately preceding sentences or whether it refers to other types of development and, if the later, whether this is all other types of development or only certain categories of types of development. This needs to be clarified.

In relation to identifying the appropriate level of provision draft policy Econ 2 identifies 10 considerations that will be taken into account. This approach does not provide any clear guidance to potential developers, occupiers, local residents or any other user of the LDP, who is concerned about the appropriate level of parking that should, or should not, be provided with developments. There is no indication as to the importance to be attached to different considerations nor how these considerations will be applied. This will create inconsistent decision-making that fails to meet the objectives of the policy. As drafted the policy does not have an internal consistency that allows for reliable application.

Homes For Scotland (0404), Dandara East Scotland (0757), Wright PDL (0078), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Recognise the ambition to decrease dependence on cars but consider there is a balance to be struck.

This is a highly restrictive Policy on the provision of private parking spaces, particularly considering the Proposed Plan has a desire to have mixed and multi-generational communities. The large number of households will require the use of a private car. This parking policy will not encourage the mixed communities that the plan is targeting.



Even if residents have alternative forms of transport available for getting to work this will not be feasible for everyone, including people who have to make multiple trips each morning. Also many households may wish to retain a car for other travel as reasonable public transport links are limited in Scotland away from major centres of population. Low levels of parking can be a source of community objections to planning applications. Care should also be exercised in viewing reduced levels of parking as a means to motivate greater use of public transport. There is a risk it will instead make the homes less marketable (with implications for effectiveness and delivery) and/or lead residents to park elsewhere causing parking issues in the local area.

Recommends that the size of the unit/number of bedrooms, as well as the accessibility of the location, must be considered when determining the appropriate level of private car parking. Additionally, have electric vehicles been fully considered? There appears to be no clear distinction made to separate these vehicles, and to allow for their proliferation in a targeted way.

#### HUB Residential (0582)

This is a highly restrictive Policy on the provision of private parking spaces, particularly considering the Proposed Plan has a desire to have mixed and multi-generational communities. Large numbers of households will require the use of a private car, and this parking policy will not encourage the mixed communities that the plan is targeting.

#### Lynn Grattage (0362)

I don't agree in restricting private car parking and enough parking needs to be provided within new developments for the cars people will inevitably have. If car usage is reduced the car spaces can be turned into bike lockers.

There is already pressure of parking on Gorgie Road near H73, and proposals will only make it worse. Parking on Gorgie Road needs to be reduced if the Council are serious about getting people cycling and using the bus, so you can improve the bus services (all day 7/7/7 bus lanes), and mandatory cycle lanes.

You are equating car ownership with car use. I have a car, but only use it for limited trips. Many others will also need cars for work, leisure and caring responsibilities. By limiting car parking in more densely populated parts of Edinburgh you create further inequalities, as those who can afford bigger properties with drives or garages can have a car, those in other housing can't.

What you really need and should have introduced years ago, is a congestion charge, which you can then use to fund adequate walking and cycling and bus routes. Sheltered housing still needs parking spaces for family and carers who are visiting.

#### Watkin Jones Group (0516)

In terms of private car parking, student accommodation development does not require parking spaces and students are expected to sign-up to lease agreements discouraging owning cars, which alongside a number of other initiatives ensures that students do not require a car.

Although private car ownership is likely to be higher in BTR and private residential development, car ownership is generally in decline, and it is now common across the UK for residential developments in highly accessible locations to be car free.

#### Transform Scotland (0595)

The aims of the plan in relation to parking levels, reducing the need to travel and promoting the shift from the private car are admirable objectives but look to be undermined by certain contradictory aspects of the Plan. In this respect, parking policy is crucial. However, there are numerous examples where a consistent approach has not been taken in the Plan in terms of the maximum parking limits objective. All sites must be held to the same, high standard.

Segregated cycle routes should be standard, not optional. If the car remains an alternative, it will be used, and in many cases once a private car is available, it is cheaper to use it than to use public transport. As we know from past experience in Edinburgh, attempts to make provision for many different modes of transport simultaneously within limited space reduces the efficiency of them all. Car use other than for limited purposes must not be part of any new developments in the city as it will merely add to existing problems.

#### Alasdair Gillies (0035)

The policy is too restrictive, what if family members need to visit the homeowner and there's no provision for parking? You're making it too difficult to get around which will make people more isolated.

#### Leith Central Community Council (0614)

Electric vehicle charging facilities are not properly accounted for. They should be encouraged for e-bikes and for shared or non-private car use. Many jobs rely on the use of private vehicles (trades, deliveries, etc) and will continue to do so in the near future

New developments should have a very limited net car traffic impact; this could include limited accessible onsite parking (and CPZ in the whole area) and/or car traffic reducing and public transport measures (e.g. temporary subsidies for bus routes, as for Ocean Terminal) in the vicinity (defined as: 5 minutes walking distance).

There should be a clear policy that prevents conversions of front gardens into private parking.

#### Aldi Stores Ltd. (0526)

The Council's Low Emissions Zone has yet to be fully agreed and so this policy wording appears premature, particularly where the boundaries are still unknown.

The requirements to provide electric vehicle charging infrastructure for every proposed space is considered excessive and does not acknowledge the levels of current demand. Electrical vehicle charging infrastructure is a fast-growing sector with continuously evolving technology. Implementing Electrical vehicle charging for every space would be a significant cost, potentially harming development viability, but also unnecessary and wasteful due to the predicted uptake and requirement to replace infrastructure frequently,

as technology improves. A phased approach is more reasonable and one that would not challenge the viability schemes and result in wastage, given the technological advancements that continue to occur in this fast-moving sector.

Stirling Developments Limited (0303)

We support the intention of this policy, but it must be recognised that private car ownership is still very important and will be during the plan period.

CoMoUK (0728)

The policy should be amended to encourage the repurposing of on-street parking for Mobility Hubs. A case study is found in CoMoUK's Mobility Hubs Toolkit page 21: a mobility hub inhabiting reclaimed parking spaces at South Woodford in the London Borough of Redbridge.

Prof. Rustam Salman (0207)

The lack of neighbourhood infrastructure for electric vehicle charging is the only thing that is preventing me from switching from a hybrid car. It needs to be put in place urgently. I have not seen any clear proposals from Edinburgh Council about this.

Living Streets Edinburgh Group (0486)

The first sentence of this policy is endorsed. However, the intent is subsequently watered down with too many caveats and in order to support the policy changes are needed and we would ask the Council to reconsider so that the hierarchy in Scottish Planning Policy and the National Transport Strategy can be delivered throughout the city.

Reference to the Low Emission Zone is a red herring. The whole city is accessible by public transport and much of it by walking and cycling. Where public transport or pedestrian infrastructure requires enhancement this should be done by securing developer contributions or not allowing development until the necessary upgrades are in place. This applies to residential and non-residential.

Crosswind Developments Ltd. (0184)

Supportive of Policy Inf 7 as it recognises that car lite proposals can be acceptable in well-connected locations. For reasonableness CDL request an amendment to point "g"  
" A site appropriate level of smart electric charging provision should be supplied".

Cramond & Barnton Community Council (0243)

Inf 7 states 'Within the Council's Low Emission Zone private car parking (other than accessible spaces) will not be permitted.' This blanket prohibition lacks flexibility, is unrealistic and ignores the needs young families, less able and infirm residents without blue badges, and businesses dependent on access for goods, etc.. If the LEZ extends over most, or all, of the whole City, there will be no provision within the City's boundaries for private parking. Additionally, it is unclear whether the policy applies to existing properties, or only to new development.

Criterion h should be deleted, as a blanket ban on more than one parking space per home, especially in suburban and countryside areas of the City, will result in the displacement of residents', visitors' cars and tradesmen's vehicles from driveways onto roads contrary to 'Living Streets' principles and to the inconvenience of utility and emergency service vehicles.

Andy Agnew (0562)

The City Plan should recognise that by requiring that all new domestic and commercial properties install charging capability in at least 50% of the spaces they provide. This will need supported by the provision of significant charging infrastructure. Energy networks will need storage capability especially where they are provided by solar power that is not constantly available. The provision of electric car charging in new developments as in the comment on Inf 8 will allow smart networks to use cars as storage and ensure supply is constant.

Peter Brown (0672)

Street parking in the city should be gradually eliminated.

Crosslane Co-Living SPV 2 Limited (0687)

Support the modal shift away from private car travel as set out in the Proposed Plan. The Ocean Point 2 site is well-connected in public transport terms and ideally placed to assist in bringing forward a modal shift away from private car travel.

### **Inf 8- Design of Car Parking**

Mark Ockendon (0419)

Criteria D of Inf 8 should be modified. "With less car dominance." Should be removed.

Ernest Evans (0053)

Encouraging or enforcing the use of "garden space" for parking in new development is short sighted. The paving over of green spaces will not help the environment. When we introduce these well meaning rules please consider there is a cost to the environment. Developers do not reduce the number of houses to make room for parking, instead they cut away half of the garden and call it a car park. This is dangerous.

Cramond & Barnton Community Council (0243)

There have been several examples of recent planning applications where proposed homes contain garages of an insufficient size to accommodate standard cars plus cycles. This results in on-street parking and congested streets, causing difficulties for access by emergency and utility vehicles and increasing pavement parking, which obstructs pedestrian movement.

Dave Berry (0463)

Charging infrastructure is an essential requirement to complete the shift from fossil fuel vehicles to electric vehicles and thus achieve the desired reduction in CO2 emissions, air pollution, and noise pollution. In a densely populated city, where many people live in tenements and flats, we cannot rely solely on domestic charging facilities.

Living Streets Edinburgh Group (0486)

It is anticipated that for the most part parking will only be required for disabled or essential servicing use. This should be made clear and policy worded to set out design and location expectations for such essential parking, whilst unambiguously requiring any other parking that may be justified following assessment to be located at the rear of or below properties accessed in such a way as to cause no conflict with pedestrians.

### **Inf 9- City Centre Public Parking**

Juniper Green & Baberton Mains Community Council. (0306)

This policy will lead to city-centre shops catering only for lightweight and non-bulky items, thus obliging people to get into their cars to edge of town shopping malls. It is not realistic and probably contrary to the aim of a vibrant city centre.

Mark Ockendon (0419)

Rather than having a presumption against cars the Council's focus should be on improving the alternatives and on the problem - reducing carbon emissions, increasing mobility and convenience.

People in many areas of Edinburgh have inefficient bus links. A further study of the bus network and route layouts should be undertaken, not just from a cost/efficiency perspective, but also from a quality-of-life perspective (access and journey times). Reducing the cost of bus & tram travel could encouraging people to switch to public transport.

In any case the cost of public transport is regressive and hits the poorest hardest - a policy aim to provide free public transport for ALL local residents would be socially equalising and welcomed.

We should encourage the uptake of electric vehicles, which directly reduce emissions, especially in Scotland where we generate significant amounts of renewable electricity. An Electric Vehicle Strategy should be further developed with specific focus on expanding the network of EV charging points.

Lanes used by trams should be shared with buses, cars and taxis. Bus lanes should continue to be in force only at peak times, freeing up road space at other times.

How many cars sit idling at red lights in quiet times? The council should take a proactive forward-thinking traffic management and consider introducing the green + flashing amber system used in other countries. There is also some evidence that traffic lights turned off at certain times results in no compromise to safety.

Living Streets Edinburgh Group (0486)

Support the policy but request that the low emission zone be made city wide otherwise the Council will be encouraging the relocation of emission producing car and other vehicle movements into other areas.

Cockburn Association (0777)

Support the policy subject to clarification of provision for accessible parking.

Andy Inglis (0138)

It's wrong-headed. Stop cars entering the city centre and you remove the need for much of the parking. It's political suicide, of course, but that's what it will take: a single term of government to enact the change needed in year 1, and the next 4 years to embed them so deeply that the next administration cannot overturn them. It will never happen, and I of course understand why, which is why the 2030 plan will fail. This isn't to say it shouldn't be attempted. I don't believe our species will be around in the next century but I'll keep recycling: I support the effort.

Archie Clark (0003)

The proposed policy will lead to the City centre shops only catering for lightweight and non-bulky items (which will therefore exclude the weekly shopping trip), thus obliging people to get into their cars to go to edge of town shopping malls. In addition, if CEC wants to attract people into the city centre to shop and enjoy tourist attractions, then parking has to be affordable. At present, it isn't. People will spend their money in the shops (who pay business rates) but will be deterred if they first have to pay excessive sums to the Council. Free parking would probably benefit both the Council and the shops best.

## **Inf 12- Park and Ride**

Cramond & Barnton Community Council (0243)

Additional Park-and-Rides should be safeguarded/developed on the NW edge of City, between Newton and South Queensferry, or at Craigiehall. New Park-and-Rides at the above locations could reduce some traffic pressures on the A90 corridor into Edinburgh.

Liberton & District Community Council (0084)

The policy is supported, however, Park & Ride facilities should be provided on Lasswade Road and Gilmerton Road.

Michael Ramsey (0011)

Supports the plan in general. However, a park-and-ride system collecting cars from the Forth Bridge Crossing and heading into Edinburgh would make a big difference to traffic problems. Cars could be parked in the open greenbelt land around Dalmeny and Queensferry. Better still use the train line from Queensferry or connect up to the tram network.

Friends of Cammo (0387)

Welcome the support for additional Park & Ride, but there should be a clear recommendation for a Park & Ride serving the A90 corridor, served by regular buses.

Gordon McKay Brown (0573)

Supports the policy. Through traffic from outside the city needs to be prevented through Morningside to allow it to become a true 20 minute community. A Park and ride at Hillend ski centre would help with this.

Lynn Grattage (0362)

Supports the policy. However there needs to be way more park and ride facilities as the current ones can become full. The cost of these could be recouped with a congestion charge.

Mr John G. Skinner (0065)

It is regrettable that there appears to be no specific date for the introduction of park and ride measures allowed for.

Jean Morley (0461)

The volume of traffic coming from Fife should be reduced with the addition of a south side park-and-ride

Crosswind Developments Ltd (0184)

This policy is listed as relevant to the Crosswind proposals on the proposals map. The Crosswind allocation does not include plans for a park and ride and it is therefore not relevant.

**Modifications sought by those submitting representations:**

Gareth Hutchinson (0290)

No modifications specified in relation to the proposed plan but it is indicated that permit parking proposal should not be included in housing proposal area H54 (St Clair Street) and that the disused inner railway line should be utilised.

Deirdre Hutchinson. (0285)

No modifications specified in relation to the proposed plan but it is indicated that permit parking proposal should not be included in housing proposal area H54 (St Clair Street)

Dr Patricia Roche (0281)

No modifications specified in relation to the proposed plan but it is indicated that the changes to the Council's Proposed Parking Zones be reconsidered and repealed. The consultation process should be redesigned and the consultation period should be extended.

Sergey Gorobets (0414)

No modifications specified in relation to the proposed plan but it is indicated that the Council should think about what could be done to improve public and active travel without charging locals.

Alasdair Gillies (0035)

No modifications specified in relation to the proposed plan but it is indicated capacity should be added to the car parking at the ERI to ease pressure for staff working there and remove unnecessary stress for those visiting.

**Inf 6- Cycle Parking**

Watkin Jones Group (0516)

The LDP standards for cycle parking provision should align with BREEAM. BREEAM requires a 50% cycle parking provision on new student accommodation developments, and this is recognised throughout the world as a sustainable standard. In our client's experience, cycle parking in student accommodation is typically used by up to 25% of their residents.

To offset the onsite provision applicants could also propose a bike-hire facility that will benefit the future residents and the existing community through new sustainable transport infrastructure. Other means than simply supplying 100% cycle parking provision should be considered, and this can be addressed through transport statements in support of proposals and thereafter monitored through Travel Plans.

Cramond & Barnton Community Council (0243)

This policy should be extended to include provision (e.g. secure storage, e-charging) for electric wheelchairs, mobility scooters and similar aids, especially in residential accommodation with high proportions of elderly, infirm or less-able residents.

Aldi Stores Ltd.(0526)

Paragraph 3.202 should be re-worded to enable divergence from the standards where this can be justified.

No other modifications specified in relation to the proposed plan but it is indicated that the levels of cycle parking set out is unrealistic for a food retailer to provide and guidance should be more clear about charging stations.

**Inf 7- Private Car Parking**

Archie Clark (0003)

'Accessible spaces' or 'accessible parking' should be defined in the plan.

No other modifications specified but it is indicated that the statement in Inf 7 is not realistic.

Mark Ockendon (0419)



"Private parking (other than accessible spaces) will not be permitted" should be revised to "Private parking will be permitted where traffic can be accommodated within existing road infrastructure and providing electric vehicle charging points are included for all private spaces and a proportion of on-street parking spaces."

sub-paragraph D "the proposed use assumes no or low car ownership and use by potential occupiers, for example purpose-built sheltered housing or student accommodation", should be removed.

Paragraph 3.203 should be removed in its entirety and replaced with "Determining the appropriate level of parking must be informed by location, access to public transport and other controls and incentives that can be put in place. Private car parking will be supported within developments provided traffic volumes can be managed within the existing (or modified) road infrastructure and providing EV charging points are included for all private spaces. Developments must also demonstrate connection to integrated public transport infrastructure in order to provide a suite of transport options. The Council will continue to allow residents parking permits in new development where it can be integrated as above."

Paragraph 3.204 should be removed in its entirety and replaced with "The aim of transport infrastructure is to allow flexible and convenient movement throughout the city. This must be balanced with the need to reduce carbon. An integrated approach which includes adequate provision for car parking will be supported, whilst encouraging (rather than forcing) a move to lower-carbon solutions through initiatives such as the low emission zone, progressive pricing for residents parking permits based on CO2 emission levels, and free or significantly reduced public transport throughout the city."

Paragraph 3.205, should be removed entirely.

Taylor Wimpey (0200), BDW Trading (0350), Stewart Milne Homes (0118)

Amendments to criterion (h) are required to strike a more appropriate balance between encouraging active and public transport and ensuring sufficient parking provision subject to locational and site specific considerations.

Ambassador Group (0683)

The policy requires to be amended to retain flexibility to allow appropriate levels of car parking to occur on sites depending on site specific circumstances.

Juniper Green & Baberton Mains Community Council. (0306)

No modifications are specified but it is indicated that the statement "Within the Council's Low Emission Zone private car parking (other than accessible spaces) will not be permitted." is not realistic.

Lidl (0181)

The explanation of the policy should be set out in a separate SPG and that Policy Inf 10 (sic) is amended to simply identify that:

(i) support is given to development that does not require private car use and encourages parking free/low parking standards will be applied (with “low parking standards” defined).

(ii) Reference to the provision of a SPG that sets out in detail how different considerations will be applied to determine appropriate private-parking levels. Clear detailed guidance as to the precise issues that will be considered, and how these will be used, for each of the 10 considerations identified in the policy

(iii) In the absence of the SPG continuation of the maximum parking standards currently in place in the City of Edinburgh.

Homes For Scotland (0404), Dandara East Scotland (0757), Wright PDL (0078), Barratt David Wilson Homes (0677), Steve Loomes (0767)

No modification specified but it is indicated that the size of the unit/number of bedrooms, as well as the accessibility of the location, must be considered when determining the appropriate level of private car parking.

Also a clear distinction should be made between electric and internal combustion engines and to allow for the proliferation of electric vehicles in a targeted way. Care should be exercised in viewing reduced levels of parking as a means to motivate greater use of public transport. There is a risk it will instead make the homes less marketable (with implications for effectiveness and delivery) and/or lead residents to park elsewhere causing parking issues in the local area.

HUB Residential (0582)

The policy should be amended so that there is more flexibility to allow for car parking provision below the minimum standards where this is justified against certain criteria.

Lynn Grattage (0362)

Criterion (d) of Inf 7 should be modified to ensure that sheltered housing has parking spaces for family and carers who are visiting.

It is indicated that Paragraph 2.118 should be modified to remove the point which states that Private car parking should be restricted. A congestion charge should also be introduced.

Watkin Jones Group (0516)

No modification specified but it is indicated that wider parking and public transport measures be a core part of the plan to ensure that the proposal to deliver development with reduced or no car facilities can be successfully accommodated in the fabric of the city.

Transform Scotland (0595)

The Plan should be reviewed generally in order to apply consistently the 'maximum parking limits' objective.

Alasdair Gillies (0035)

No modification specified but it is indicated that the policy is too restrictive.

Leith Central Community Council (0614)

There should be a clear policy that prevents conversions of front gardens into private parking. Electric vehicle charging facilities are not properly accounted for.

Aldi Stores Ltd. (0526)

This policy should be altered to require ducting to 'future proof' the spaces and allow for the future conversion into electrical vehicle spaces as demand grows and technology advances. We consider this a more reasonable approach to a policy, which in principle, Aldi do support.

Stirling Developments Limited (0303)

No modification specified but it is indicated that it must be recognised that private car ownership is still very important and will be during the plan period.

CoMoUK (0728)

The policy should be amended to encourage the repurposing of on-street parking for Mobility Hub.

Prof. Rustam Salman (0207)

Criterion (g) which states that any car parking spaces will have smart electric vehicle charging provision needs to be time-bound.

Living Streets Edinburgh Group (0486)

No modifications are specified however it is indicated that the policies intent should not be watered down and changes to the wording of the policy are needed.

Where public transport or pedestrian infrastructure requires enhancement this should be done by securing developer contributions or not allowing development until the necessary upgrades are in place.

Crosswind Developments Ltd. (0184)

Criterion "g" should be amended as follows:  
"A site appropriate level of smart electric charging provision should be supplied".

Cramond & Barnton Community Council (0243)

The policy states that 'Within the Council's Low Emission Zone private car parking (other than accessible spaces) will not be permitted.'. This should be amended to state that private car parking may be restricted in new developments in Low Emission Zone. It should not be a blanket prohibition.

Criterion h should be deleted, or made more flexible.

Andy Agnew (0562)

The City Plan should require that all new domestic and commercial properties install charging capability in at least 50% of the spaces they provide. Greater charging infrastructure will be required.

Peter Brown (0672)

No modifications are specified however it is indicated that street parking in the city should be gradually eliminated.

Crosslane Co-Living SPV 2 Limited (0687)

No modifications are specified but it is indicated that the Ocean Point 2 site is well-connected in public transport terms and ideally placed to assist in bringing forward a modal shift away from private car travel.

**Inf 8- Design of Car Parking**

Mark Ockendon (0419)

Criteria D of Inf 8 should be modified. "With less car dominance." Should be removed.

Ernest Evans (0053)

No modifications are specified however it is indicated that encouraging or enforcing the use of "garden space" for parking in new development is short sighted, unsafe and will not help the environment.

Cramond & Barnton Community Council (0243)

This policy should include a policy for parking provision in new housing developments, which is cross-referenced to new specifications in Edinburgh Design Guidance identifying minimum sizes of garages, to ensure that these can provide off-street parking for a standard size car and several bicycles.

Inf 8 should also include a requirement for all car parking spaces in new housing developments to have ready access to e-charging provision.

Dave Berry (0463)

A new paragraph should be inserted after 3.207 which states that  
"All parking provision should provide charging facilities for electric vehicles"

Living Streets Edinburgh Group (0486)

The policy should make it clear that parking will only be required for disabled or essential servicing use and policy should be worded to set out design and location expectations for

such essential parking, whilst unambiguously requiring any other parking that may be justified following assessment to be located at the rear of or below properties accessed in such a way as to cause no conflict with pedestrians.

### **Inf 9- City Centre Public Parking**

#### Juniper Green & Baberton Mains Community Council. (0306)

No modifications are specified but it is indicated that the statement "Within the Council's Low Emission Zone private car parking (other than accessible spaces) will not be permitted." is not realistic.

#### Mark Ockendon (0419)

Replace the wording of the policy with "Proposals for new off-street car parking will be permitted where traffic can be accommodated within existing road infrastructure, and providing electric vehicle charging points are included for all private spaces and a proportion of on-street parking spaces."

Remove paragraph 3.208 entirely and replace with "The aim of transport infrastructure is to allow flexible and convenient movement throughout the city. This must be balanced with the need to reduce carbon. An integrated approach which includes adequate provision for car parking will be supported, whilst encouraging (rather than forcing) a move to lower-carbon solutions through initiatives such as the low emission zone, progressive pricing for residents parking permits based on CO2 emission levels, and free or significantly reduced public transport throughout the city."

#### Living Streets Edinburgh Group (0486)

Request that the low emission zone be made city wide.

#### Cockburn Association (0777)

No modification specified but require clarification of provision for accessible parking.

#### Andy Inglis (0138)

No modification indicated.

#### Archie Clark (0003)

No modification specified but it is indicated that parking within the city should not be restricted, and parking should be free.

### **Inf 12- Park and Ride**

#### Cramond & Barnton Community Council (0243)

It should be specified that additional Park-and-Rides should be safeguarded/developed on the NW edge of City, between Newton and South Queensferry, or at Craigiehall.

Liberton & District Community Council (0084)

Park & Ride facilities should be provided on Lasswade Road and Gilmerton Road.

Michael Ramsey (0011)

A park-and-ride system collecting cars from the Forth Bridge Crossing and heading into Edinburgh should be part of the plan.

Friends of Cammo (0387)

The plan should recommend a Park & Ride serving the A90 corridor, served by regular buses.

Gordon McKay Brown (0573)

The plan should include a Park and ride at Hillend ski centre.

Lynn Grattage (0362)

The plan should include way more park and ride facilities.

Mr John G. Skinner (0065)

No modifications specified but it is indicated that it is regrettable that there appears to be no specific date for the introduction of park and ride measures allowed for.

Jean Morley (0461)

The plan should include a south side park-and-ride.

Crosswind Developments Ltd (0184)

This policy should be removed from the list of applicable policies for Crosswind (H61) on the proposals map.

**Summary of responses (including reasons) by planning authority:**

**General Parking Comments**

Gareth Hutchinson (0290)

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP (CD062) in terms of managing private car use and public space.

One of the key City Plan aims is to adopt an infrastructure first approach. Safeguards and proposals are set out in part 4 of the plan. These have been informed by the TA (CD014), ESSTS (CD071), CMP (CD062), WETA 2016 Refresh (CD073) and WETIP (CD072). **No modification proposed**

Deirdre Hutchinson. (0285)

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP (CD062) in terms of managing private car use and public space. **No modification proposed**

Dr Patricia Roche (0281)

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP (CD062) in terms of managing private car use and public space. **No modification proposed**

Sergey Gorobets (0414)

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP (CD062) in terms of managing private car use and public space.

One of the key outcomes of the plan is for Edinburgh by 2030 to be a city where you don't need a car to move around. Paragraph 2.111 states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Part 4 of the plan sets out the proposals to deliver the strategy and policies. **No modification proposed**

Alasdair Gillies (0035)

Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP (CD062) in terms of managing private car use and public space.

One of the key outcomes of the plan is for Edinburgh by 2030 to be a city where you don't need a car to move around. Paragraph 2.111 states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Part 4 of the plan sets out the proposals to deliver the strategy and policies.

Part 4 of the plan sets out a number of proposals and safeguards, including active travel and orbital bus routes and a tram route safeguard which shall link the ERI site with other areas of the city. **No modification proposed**

Katherine Kennedy (0569), Dave Berry (0463), Grange & Prestonfield Community Council (0192)

Support Noted

## **Inf 6- Cycle Parking**

Watkin Jones Group (0516)

Criterion (c) of Inf 6 states that proposals for residential development will be supported where the provision meets or exceeds the standards set out in Council Guidance and is in accordance with Council guidance. The current LDP (CD039) also states that planning

permission will be granted for development where proposed cycle parking and storage provision complies with the standards set out in Council guidance. The current cycle parking standards for housing and student accommodation is set out in the Edinburgh Design Guidance 2020 (CD047). **No modification proposed**

Cramond & Barnton Community Council (0243)

The majority of wheelchairs and mobility scooters can be utilised indoors. The internal storage and accessibility of new buildings is regulated by the Building Standards legislation. Many wheelchairs and scooters can also be charged using regular 3 pin internal sockets. The Council considers the wording of policy Inf 6 to be robust and will ensure that the aims of the plan are achieved. **No modification proposed.**

Aldi Stores Ltd. (0526)

The Council considers that the policy provides adequately for an appropriate balance of parking provision. No modification proposed, however, should the Reporter be so minded the policy could be amended to state that high quality cycle parking facilities should always be closer to development entrances than non-accessible car parking spaces, for clarity.

The current cycle parking standards are set out in the Edinburgh Design Guidance 2020 (CD047). The examination of the plan cannot amend existing guidance. Policy Env 25 (Layout Design) criterion (e) states that safe and convenient access and movement in and around the development will be promoted, having regard especially to the needs of people with limited mobility or special needs. Every application is unique and will be considered on its own individual merits. **No modification proposed.**

**Inf 7- Private Car Parking**

Archie Clark (0003)

Paragraph 2.118 clearly articulates the aims of the plan which are in line with the sustainable transport hierarchy. Paragraph 2.118 states that the Scottish Government intends to achieve its commitment to a 20% reduction in the distance travelled by car by 2030.

Policy Inf 7 establishes that the appropriate level of provision will be determined by sustainable transport accessibility levels, including committed public transport and active travel infrastructure or located in a central area. City Plan will realise the lifelong benefits of walking, wheeling and cycling by creating streets and public spaces over cars and improving and expanding sustainable public transport.

Every application is unique and is determined on its own individual merits. The wording of Inf 7 provides a planning officer the required degree of flexibility whilst also being suitably robust and defensible. **No modification proposed.**

Mark Ockendon (0419)

The Council considers the wording of policy Inf 7 to be robust and will ensure that the aims of the strategy will be delivered. **No modification proposed.**



Taylor Wimpey (0200), BDW Trading (0350), Stewart Milne Homes (0118)

The Council considers the wording of policy Inf 7 to be robust and will ensure that the aims of the strategy will be delivered. Criterion (h) of Inf 7 will also ensure that adequate amenity space is retained within the grounds of properties **No modification proposed.**

Ambassador Group (0683)

The Council considers the wording of policy Inf 7 to be robust and will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Juniper Green & Baberton Mains Community Council.(0306)

Paragraph 2.118 clearly articulates the aims of the plan which are in line with the sustainable transport hierarchy. Paragraph 2.118 states that the Scottish Government intends to achieve its commitment to a 20% reduction in the distance travelled by car by 2030.

Policy Inf 7 establishes that the appropriate level of provision will be determined by sustainable transport accessibility levels, including committed public transport and active travel infrastructure or located in a central area. City Plan will realise the lifelong benefits of walking, wheeling and cycling by creating streets and public spaces over cars and improving and expanding sustainable public transport.

The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Lidl (0181)

Policy Inf 7 makes it clear that development will be supported where private car use is not needed. The fourth sentence is applicable where parking provision within a development site is required or considered acceptable. The policy clearly applies to all types of development as the policy does not specify.

Criterion (a) of policy Inf 7 makes it clear that sustainable transport accessibility levels, following a methodology to determine a locations public transport accessibility and walkability ratio will be set out in planning guidance.

Every application is unique and is determined on its own individual merits. The wording of Inf 7 provides a planning officer the required degree of flexibility when determining an application, whilst also being suitably robust and defensible. **No modification proposed.**

Homes For Scotland (0404), Dandara East Scotland (0757), Wright PDL (0078), Barratt David Wilson Homes (0677), Steve Loomes (0767)

Policy Inf 7 establishes that the appropriate level of provision will be determined by sustainable transport accessibility levels\*, including committed public transport and active travel infrastructure or located in a central area. (\*Following a methodology to determine a locations public transport accessibility and walkability ratio that will be set out in planning guidance).

Paragraph 2.114 states that the plan sets out Edinburgh's mass transit network, including proposed new public transport actions, including from the City Mobility Plan (CD062) and the Edinburgh Sustainable Strategic Transport Strategy (CD071). The strategy is supported by the Scottish Governments National Transport Strategy 2 (CD110) and the emerging case for Strategic Transport Projects Review 2 (CD111) which supports investment in sustainable public transport.

Paragraph 3.204 states that meeting our targets for shifting car use to sustainable travel modes must guide our approach to controlling the demand for car parking. Restricting car parking spaces available on site, controlling on-street parking in surrounding streets, encouraging use of sustainable and public transport and alternatives to car ownership through the provision of shared mobility services are all needed. No evidence has been provided that restricting car parking makes properties less marketable. Paragraph 2.112 explains that City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas where there is good public transport, including tram. It also aims to ensure that everyone has access to a range of amenities in their area through the promotion of 20 minute neighbourhoods. These strategies, proposals and policies are all designed to deliver one of the City Plan's aims which is by 2030, we want Edinburgh to be a city where you don't need to own a car to get around.

The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed.**

#### HUB Residential (0582)

Policy Inf 7 provides a range of factors in which the appropriate level of provision will be determined. This provides the required degree of flexibility. **No modification proposed.**

#### Lynn Grattage (0362)

Paragraph 2.118 clearly articulates the aims of the plan which are in line with the sustainable transport hierarchy.

Policy Inf 7 establishes that the appropriate level of provision will be determined by sustainable transport accessibility levels, including committed public transport and active travel infrastructure or located in a central area. City Plan will realise the lifelong benefits of walking, wheeling and cycling by creating streets and public spaces over cars and improving and expanding sustainable public transport. City Plan does not propose a congestion charge. Paragraph 3.204 states that meeting our targets for shifting car use to sustainable transport modes must guide our approach to controlling the demand for car parking. Restricting car parking spaces available on site, controlling on street parking in surrounding streets, encouraging use of sustainable and public transport and providing alternatives to car ownership through the provision of shared mobility services are all needed. **No modification proposed.**

#### Watkin Jones Group (0516)

Proposed public transport improvement measures are a core part of the plan. Policy Inf 7 aims to support development where private car use is not needed. **No modification proposed.**

Transform Scotland (0595)

Policy Inf 7 provides a range of factors in which the appropriate level of provision will be determined. This provides the required degree of flexibility as every application is unique and is determined on its own individual merits. **No modification proposed.**

Alasdair Gillies (0035)

Policy Inf 7 provides a range of factors in which the appropriate level of provision will be determined. The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Leith Central Community Council (0614)

Criterion (g) of policy Inf 7 states that any car parking spaces will have electric vehicle charging provision. Criterion (h) of policy Inf 7 states that no additional space for car parking can be accommodated within the curtilage of a dwelling by careful design of gardens.

For many conversions of front gardens to private parking areas planning permission is not required as they benefit from permitted development rights as set in statute by the Scottish Government (CD106). Policy Inf 7 and Inf 8 will apply where planning permission is required for the conversion of gardens to driveways. **No modification proposed.**

Aldi Stores Ltd. (0526)

Edinburgh City Centre LEZ was approved by Scottish Ministers on 19 May 2022 and was introduced on 31 May 2022. Enforcement will start on 1 June 2024, following a two-year grace period for all.

Every planning application is unique and will be determined on its own merits. If development viability was to be a concern then an open book exercise could potentially be a material consideration.

The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Stirling Developments Limited.(0303)

Comments are noted. One of the key outcomes of the plan is by 2030 Edinburgh will be a city where you don't need to own a car to move around. **No modification proposed.**

CoMoUK (0728)

Part 4 of the plan identifies a number of areas where mobility hubs are proposed. Work on the positioning and design of these hubs is ongoing. **No modification proposed.**

Prof. Rustam Salman (0207)

The Council is installing a network of electric vehicle charging points around the City through funding from Transport Scotland's Switched on Towns and Cities Challenge Fund (CD153). Criterion (g) of policy Inf 7 makes it clear that any car parking spaces in proposed new developments must have smart vehicle charging provision. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy are delivered. One of the key aims of the plan is to adopt an infrastructure first approach, directing new development to where there is existing infrastructure. Where required to support new development, the plan requires new and expanded community infrastructure including sustainable transport to support the spatial strategy. **No modification proposed.**

Crosswind Developments Ltd. (0184)

The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Cramond & Barnton Community Council (0243)

The Council considers the wording of policy Inf 7 to be robust and it will ensure that the aims of the strategy are delivered. The policy states that only within the currently defined LEZ private car parking (other than accessible spaces) will not be permitted. The policy will only be applicable when planning permission is required for development. It will not affect existing car parking spaces or where permitted development rights exclude the requirement for planning permission. **No modification proposed.**

Andy Agnew (0562)

Criterion (g) of Inf 7 states that any car parking spaces will have smart electric vehicle charging provision. Further details of the specifics of the infrastructure required will be assessed at the planning application stage. **No modification proposed.**

Peter Brown (0672)

Paragraph 2.118 clearly articulates the aims of the plan which are in line with the sustainable transport hierarchy.

Paragraph 3.204 states that meeting our targets for shifting car use to sustainable transport modes must guide our approach to controlling the demand for car parking. Restricting car parking spaces available on site, controlling on street parking in surrounding streets, encouraging use of sustainable and public transport and providing alternatives to car ownership through the provision of shared mobility services are all needed. **No modification proposed.**

Crosslane Co-Living SPV 2 Limited (0687)

Comments noted. **No modification proposed.**

Katherine Kennedy (0569), Union Property Services Ltd/VRS Ltd (0584), SEPA (0012), Grange & Prestonfield Community Council (0192)

Support Noted

### **Inf 8- Design of Car Parking**

Mark Ockendon (0419)

The Council considers the wording of policy Inf 8 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Ernest Evans (0053)

The plan does not encourage the use of garden space for parking in new developments. Criterion (h) of policy Inf 7 supports development where no additional space for car parking can be accommodated within the curtilage of a dwelling by careful design of gardens, driveways and integral garages. The Council considers the wording of policy Inf 8 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Cramond & Barnton Community Council (0243)

The specifications of garage and driveways in future developments will be assessed at the planning application stage. Criterion (g) of policy Inf 7 states that any car parking spaces will have smart electric vehicle charging provision. The Council considers the wording of policy Inf 8 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Dave Berry (0463)

Criterion (g) of policy Inf 7 states that any car parking spaces will have smart electric vehicle charging provision. The Council considers the wording of policy Inf 8 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Living Streets Edinburgh Group (0486)

The Council considers the wording of policy Inf 8 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Katherine Kennedy (0569), SEPA (0012), Grange & Prestonfield Community Council (0192)

Support Noted

### **Inf 9- City Centre Public Parking**

Juniper Green & Baberton Mains Community Council. (0306)

Policy Inf 9 will only be applicable when planning permission is required for development. It will not affect existing car parking spaces or where permitted development rights exclude

the requirement for planning permission. The Council considers the wording of policy Inf 9 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Mark Ockendon (0419)

The Council considers the wording of policy Inf 9 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Living Streets Edinburgh Group (0486)

Any modifications to the LEZ will be subject to other Council processes and consultation. **No modification proposed.**

Cockburn Association (0777)

City Plan Policy Inf 9 (City Centre Public Parking) states that proposals for new off street car parking within the city centre and the Low Emission Zone will not be supported. This policy is not relevant to new developments where private car parking is proposed. It will also not impact upon existing public car parking facilities and it will not stop there being new accessible public parking being created on street. Paragraph 3.208 also acknowledges that the city centre is highly accessible by a range of sustainable transport modes. The Council considers the wording of policy Inf 9 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Andy Inglis (0138)

The Council considers the wording of policy Inf 9 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Archie Clark (0003)

Paragraph 3.208 of the plan states that the city centre is highly accessible by a range of sustainable transport modes and we want to manage the traffic that enters the city. The Council considers the wording of policy Inf 9 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed**

Katherine Kennedy (0569), SEPA (0012), Grange & Prestonfield Community Council (0192)

Support Noted

## **Inf 12- Park and Ride**

Cramond & Barnton Community Council (0243) Liberton & District Community Council (0084) Michael Ramsey (0011) Friends of Cammo (0387) Gordon McKay Brown (0573) Lynn Grattage (0362). Jean Morley (0461)

The City Plan TA (CD014), CMP (CD062), WETA 2016 refresh (CD073), WETIP (CD072) and ESSTS (CD071) have helped inform the spatial strategy of the plan and the infrastructure proposals required to deliver the strategy and policies. **No**

**modification proposed.**

Mr John G. Skinner (0065)

Paragraph 3.213 states that options for a new park and ride in West Lothian are being developed as part of WETIP (CD072) with improved bus and travel connections. This work is out with the remit of City Plan and is currently ongoing. **No modification proposed.**

Crosswind Developments Ltd (0184)

There are no park and rides identified on H61 and it is not shown on the proposals map. **No modification proposed.**

Grange & Prestonfield Community Council (0192)

Support Noted.

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 33	Transport Proposals - Active Travel.	
Development plan reference:	Part 3: Page 129, Part 4: Page 166, Page 171	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Alasdair Gillies (0035)</div><div>Andy Agnew (0562)</div><div>Andy Inglis (0138)</div><div>Archie Clark (0003)</div><div>Barratt David Wilson Homes (0677)</div><div>Bo Adams (0363)</div><div>CALA Management Ltd (0465)</div><div>Chris Byrne (0297)</div><div>Cramond &amp; Barnton Community Council (0243)</div><div>Crosswind Developments Ltd (0184)</div><div>Cynthia Shuken (0632)</div><div>Dave Berry (0463)</div><div>David Bentley (0203)</div><div>Deirdre Henderson (0727)</div><div>E&amp;A Partnerships Ltd &amp; Niddrie Development Company (0753)</div><div>Edinburgh Airport Limited (0761)</div><div>Edinburgh Access Panel (0620)</div><div>Forth Ports Limited (0496)</div><div>Friends of Cammo (0387)</div><div>Genna Spears (0081)</div><div>Gordon McKay Brown (0573)</div><div>Grange/Prestonfield Community Council (0192)</div><div>Hallam Land Management (0599)</div><div>Hallam Land Management (0615)</div><div>Hillend Leisure Ltd (0080)</div><div>Homes for Scotland (0404)</div><div>Inverdunning (Hatton Mains) Ltd (0427)</div><div>Joseph Coulson (0025)</div><div>Juniper Green &amp; Baberton Mains Community Council (0306)</div><div>Katherine Kennedy (0569)</div><div>Katie Soane (0260)</div></div><div><div>Lady Road Investment S.A.R.L. (0625)</div><div>Leith Central Community Council (0614)</div><div>Lynn Grattage (0362)</div><div>Lennie O'Hara (0027)</div><div>Liberton &amp; District Community Council (0084)</div><div>Living Streets Edinburgh Group (0486)</div><div>Louise Baker (0773)</div><div>Maciej Malaszuk (0179)</div><div>Michael Ramsey (0011)</div><div>Mike Richardson (0109)</div><div>Miller Homes Limited. (0256)</div><div>Miller Homes Ltd.(0649)</div><div>Morag MacLean (0326)</div><div>NatureScot (0528)</div><div>Portobello Amenity Society (0612)</div><div>Robert Anderson (0775)</div><div>SEPA (0012)</div><div>Shortbread House of Edinburgh Ltd (0619)</div><div>The Davidson's Mains and Silverknowes Association (0454)</div><div>Spokes Lothian (0545)</div><div>Stirling Developments Limited (0303)</div><div>Shelagh Sharp (0111)</div><div>Steve Loomes (0767)</div><div>Tarmac (0244)</div><div>The Davidson's Mains and University of Edinburgh (0464)</div><div>Water of Leith Conservation Trust (0392)</div><div>William Moyes (0305)</div></div></div>		
Provision of the development plan to which the issue relates:	Inf 10, Table 3, Table 5.	
Planning authority's summary of the representation(s):		



## **General Active Travel Comments**

### Joseph Coulson (0025)

The Scottish Government knows that walking and cycling should come first and cars should come last, and the council itself agreed this in February 2021. But this paper embodies exactly the opposite - it is a plan designed to wipe out walking and cycling. It does not understand the sustainable transport hierarchy. It will leave a city which is noisier, dirtier, and less efficient.

### Lennie O'Hara (0027)

The website to provide comment is poor. The Council is going out of the way to provide for cyclists when they make up a small proportion of road users. The city does not need as much cycle parking spaces. Road alterations and cycle lanes are poorly designed and not well used. Many cyclists and electric scooter riders do not follow the rules of the road.

### Cynthia Shuken (0632)

I would not like to see major changes or development within the centre of Edinburgh and Morningside. I object to active travel safeguards including widespread closure of city centre streets to traffic, which have caused travel havoc and impact upon the historic character of Edinburgh. I would like to see those that have been put in place during the last year or so removed or reduced.

Extensive pedestrianisation does not, in fact, lead to an increase in foot traffic and support of shops and other businesses. In fact, it discriminates against those who require to drive, like people who are disabled, are elderly or have young children or those who choose to, use vehicles (cars, buses and taxis) to access shops and other businesses will instead drive to areas outside the city that have extensive free parking. People make their own choices. This results in killing off businesses in the city centre, to the detriment of residents, tourists and the economy of the city and causes additional pollution. It is against the aims of Inf 1 and Inf 2 aims.

### Robert Anderson (0775)

The term active transport is an oversimplification of the personal options available now and into the future. Any facility provided for active transport will be used by a myriad of un-defined devices most of the growth these formats are actually illegal within the UK.

The designation of Moped is the ideal answer to bridging the transition to electric cars. Everyone on the road is removing the personal use of a petrol car.

### Genna Spears (0081)

Our pavements already have more than enough space for pedestrians and cyclists however they need urgent repair rather a dedicated cycle lane which put pedestrians in more danger than what we have already. We also do not want the removal of parking spaces and parking permits. Planners should Listen to the people living here for once.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Cycling suffers from the fact that considerable distances may need to be travelled due to past approvals where workplaces, shops, etc. have been built at greater distances than 800m from people's homes. For much of the time, Edinburgh is a wet, windy, cold and hilly city beyond the centre. Many people will either be unwilling or unable to cycle to where they wish to visit. This section avoids considering these realities and is based on hope rather than geography. It is difficult to see how some of these routes can be justified in economic returns.

What are the statistics for the percentage of Edinburgh citizens who actually cycle, and would do so to do their shopping, go to school, go to work, visit the doctor, etc?.

Lynn Grattage (0362)

The wording in Paragraph 2.119 is not strong enough. Map 8 and 2.119 must take all opportunities to enhance the walking, wheeling and cycling access to local services, ensuring routes are safe, direct and pleasant (including making necessary connections to make safe routes to schools in line with school travel plans, as appropriate) and connections are made wherever possible to the wider network of protected cycleways.

Michael Ramsey (0011)

Recommend inclusion of the orbital active travel routes around the city and inclusion of the Cammo Walk active travel route.

**INF 10- Cycle and Footpath Network. (Tables 3-5)**

William Moyes (0305)

The needs of pedestrians and cycles are not always identical. Indeed, often they conflict. The strategy does not recognise this. Pedestrians should be completely physically separated from cycling or other wheeled traffic. Lessons should be learned from the Union Canal, which is miserable for pedestrians.

The description of ATPR 9 and 10 are so vague as to be virtually meaningless. Based on the few lines in the strategy it is impossible to say if I would support or oppose these. Local residents need to be given more detail to make a considered judgement. Pedestrians need to be given proper consideration and priority in the strategy and in implementing its specific plans.

Bo Adams (0363)

There is not enough focus on decent active infrastructure. There needs to be more safe segregated active infrastructure on several roads within the City. There is no way for getting from Kaimes area into the City centre safely & actively as there are no cycle lanes. There are no pavements on certain roads like Frogston & Burdiehouse. The whole area has 5 schools around and no segregated cycle lanes. The new Frogston Primary school is dangerous as there is no safe pedestrian crossing and no cycle lanes or pavements heading west on Frogston road . The roads are potholed and there is lots of pavement clutter around Kaimes Junction.

Many roads, like Captains Road are dangerous to cycle and there are no segregated cycle lanes. There is a lack of investment in the south of the City.

Friends of Cammo (0387)

Support the policy. Note that priority should be given to securing the active travel route through the former Craigiehill army base.

Crosswind Developments Ltd (0184)

There appear to be no active travel safeguards through West Edinburgh on Map 1. This is a clearly an omission in light of the other policy requirements on cycling networks.

Object to the wording as currently proposed in Policy Inf 10. The use of the word “prejudice” as shown in bullet (b) suggests harm or disadvantage but is not sufficiently clear in this context.

University of Edinburgh (0464)

Active Travel routes are shown in close proximity to many of the University of Edinburgh’s estates. Whilst the University of Edinburgh is supportive in principle of these active travel routes, further dialogue is requested with the City of Edinburgh Council on the exact route locations and impact upon the University of Edinburgh’s campus locations.

Further information on the ability to deliver against the ambitious public sector programme to introduce city wide enhancements would be helpful to ensure that University linkages can be effectively planned to integrate with the wider investment programme.

Shortbread House of Edinburgh Ltd (0619)

The closure of Jane Street would mean that there is no longer safe access for lorries to come on and off our site at 25 Tennant Street. This would mean that we are no longer able to operate our business on this site safely. Proper consideration needs to be made of businesses that require to work in this area and access routes that rely on Jane Street.

There is also an active travel route through our car park at 25 Tennant Street. (ATPR35-Leith Walk to Bowling Green Street) This would not be safe as we operate forklift trucks in our car park and there are sometimes large vehicles moving in this area. This proposal must be reconsidered.

Barratt David Wilson Homes (0677)

BDW suggest that land control constraints may make this (Policy INF 10) impossible to implement.

Archie Clark (0003)

Mobility hubs are scattered around but there is no indicative plan to show how they

might be planned. They appear to require quite a lot of space. "Protected Cycleways". These are not defined – are they off-road or just a defined part of an existing highway? The "Active Travel Safeguard" that penetrates Balerno from the NW is of doubtful benefit. Who is it going to serve – presumably not local people? The purpose of the "Strategic Active Travel Safeguard" alongside the A71 remains unclear however as its main destination seems to be the H-W university, it is not needed as the canal towpath already provides most of the route. Likewise, the proposed link from the Heriot-Watt campus to Curriehill Station duplicates an existing footpath. It doesn't seem to serve any useful function.

It is very difficult to trace the routes shown on table 3 (Active travel strategic projects and safeguards) Maps 1, 2, 8 and the main plans are not clear enough to read comprehensively. Further details of routes is required and some routes appear to be missing from maps. Others are unnecessary.

#### Homes for Scotland (0404) Steve Loomes (0767)

Land control constraints may make Policy Inf 10 impossible to implement.

#### Water of Leith Conservation Trust (0392)

A foot/cycleway should be included over the water of Leith in Slateford / Longstone linked to Sainsburys /Asda and the developments at New mart road and Inglis Green Road.

#### Edinburgh Airport Limited (0761)

EAL wish to object to the wording as currently proposed in Policy Inf 10. The use of the word "prejudice" as shown in bullet (b) suggests harm or disadvantage but is not sufficiently clear in this context. More suitable wording for the policy would be "unacceptably impedes"

#### Cramond & Barnton Community Council (0243)

CBCC seeks inclusion of the Cammo Walk Active Travel Corridor as an additional Strategic Active Travel Project/Safeguard. Although included in the previous LDP, this route has not been developed and the Council has been unable to clarify its intentions. This designation would recognise the route's values as a strategic link between the NCN1 and NCN76 cycle routes and West Edinburgh active travel networks

CBCC seeks inclusion of an orbital active travel corridor around the city as an additional strategic active travel Project/Safeguard. Such an active travel corridor around the periphery of the City (cf. City By-pass) would provide a strategic link between many communities, retail parks and greenspaces around the City and beyond. This should be shown on the respective Proposal Maps.

#### Living Streets Edinburgh Group (0486)

Alterations proposed to the title of the policy and rewording of the policy. Whilst it is encouraging to see a range of specific active travel proposals, we would like to see a preamble for all proposals that clearly sets out the Transport Hierarchy and the

priority afforded to walking within it. We expect to see a range of proposals and investment that truly reflects the position of walking and we are keen to sit down and discuss with the Council and others to this end.

CALA Management Ltd (0465), Hallam Land Management (0599)

The proposals set out in tables 3 – 5 of the City Plan 2030 Proposed Plan (Proposed LDP) are not based on a reliable or robust assessment which evidences the requirement for the delivery of these proposals. The Transport Appraisal prepared in support of the Proposed LDP does not provide any analysis of each of the proposals and the impact these will have on the existing active travel network within the local authority. It is, therefore, not possible to determine whether the delivery of these proposals will provide any tangible improvements to the existing active travel network.

Tables 3 – 5 of the Proposed LDP also fail to provide any details or associated costs for the delivery of these proposals. It is, therefore, not possible to determine what each of the proposals will deliver or, indeed, whether they are required.

Miller Homes Ltd. (0649)

The proposals set out in tables 3 – 5 of the City Plan 2030 Proposed Plan (Proposed LDP) are not based on a reliable or robust assessment which evidences the requirement for the delivery of these proposals. The Transport Appraisal prepared in support of the Proposed LDP does not provide any analysis of each of the proposals and the impact these will have on the existing active travel network within the local authority. It is, therefore, not possible to determine whether the delivery of these proposals will provide any tangible improvements to the existing active travel network.

Tables 3 – 5 of the Proposed LDP also fail to provide any details or associated costs for the delivery of these proposals. It is, therefore, not possible to determine what each of the proposals will deliver or, indeed, whether they are required.

Miller Homes Limited objects to the non-identification of a Mobility and Neighbourhood Hub on land at South of Lang Loan. Table 4 of the Proposed LDP does not include the delivery of a Mobility and Neighbourhood Hub which can be safeguarded as part of the delivery of a housing led development at land at South of Lang Loan. This housing led development at South of Lang Loan has been promoted as part of the emerging Proposed LDP.

The delivery of a Mobility and Neighbourhood Hub at land at South of Lang Loan will support the Council's previous proposal (as set out in the MIR) for a proposed new Park & Ride facility along Lasswade Road within the south east corner of the site. This will provide improvements to the existing public transport network and will be to the benefit of residents of the development and the existing population

Louise Baker (0773)

While the policy prioritises cycling and walking within the city this requires careful planning and implementation of the detail of how our city spaces function.

At many city junctions priority remains with car users making access around the city difficult for pedestrians. The junction at the north end of Liberton Brae is an example of

this, where there is no guided crossing (green man) on Kirk Brae at this point. The difficulty for pedestrians at this junction is presently exasperated by building work so that crossing Mayfield Road at this junction is not easily possible and a detour must be taken.

#### Stirling Developments Limited (0303)

Additional provision for active travel along the A8 to Newbridge needs to be included.

#### Edinburgh Access Panel (0620)

It's essential to protect pedestrians from cyclists with effective segregation including a level-change of at least 50mm. Some pedestrians, especially those with a vision impairment are dismayed by the inadequate level of protection provided by some existing infrastructure – e.g. the poor segregation on Leith Walk.

Protection is particularly important in cases where pedestrians have to cross a cycle lane to get to and from their bus stop or parked car.

#### Leith Central Community Council (0614)

The plan should state that all new developments should always increase and add to permeability and connectivity for active travel.

Wish to see options for a future active travel route at high level safeguarded (“Leith Walk Highline”) to support connections from Pilrig Park and the North Edinburgh cycle network to East Edinburgh and the coast line between Marine Esplanade and Portobello.

#### The Davidson's Mains and Silverknowes Association (0454)

ATSG1 Active Travel Safeguard - Blackhall Path westwards extension from Silverknowes Road Bridge to Cramond Road South is supported but it should be given a higher priority to be included as a specific development proposal as part of the plan.

ATSR1 - Edinburgh Waterfront Promenade is also supported. However longer term consideration should be considered to extending it to Queensferry with the provision of a crossing of the River Almond at Cramond Harbour.

#### Forth Ports Limited (0496)

The identification of public infrastructure within the boundary of operational Port estate as outlined in Appendix 2.3 is inappropriate and unimplementable and requires to be removed from the proposed Plan. Forth Ports has repeatedly advised the Council that active travel routes through the Port estate are inappropriate.

The proposed Plans' strategy in relation to strategic access routes and education, if implemented has the potential to undermine the operation of the Port of Leith. In seeking to address the need for housing and associated infrastructure, the proposal fails to recognise the wider impact and implications for the City's economy and infrastructure. In designating the 'active travel safeguards' through the operational port estate, the Council has ignored the Reporter's direction, as set out in in the proposed

Edinburgh LDP Examination Report, 2016, to assess the feasibility of creating the east west cycle route through the Port estate.

#### Tarmac (0244)

A 'direct' connection to a segregated link is not always going to be possible. The provision of a connection to facilitate direct connection can be provided, or an indirect link across barriers should be preferable to no connection.

Proposed development at Bairdview makes provision for north- south connections across the Union Canal linking the north and south of the village and a safe route to school. It promotes walking cycling and active travel as opposed to vehicular movements.

#### Inverdunning (Hatton Mains) Ltd (0427)

A New Mobility Hub at Hatton Village should be added to table 4 (Active Travel Proposals), to reflect proposed new Hatton Village allocation.

#### Hallam Land Management (0615)

A 'direct' connection to a segregated link is not always going to be possible. The provision of a connection to facilitate direct connection can be provided, or an indirect link across barriers should be preferable to no connection.

Craigiehall has the potential to deliver the River Almond Walkway proposal contained within the LDP Proposals as part of the development layout. This cannot be delivered without landowner/ developer co-operation and liaison is ongoing in relation to feasibility studies. Development at Craigiehall would also enhance cycle and walking routes linking into the core path network through improved connectivity.

The potential for improved connectivity at Goodtrees Farm should be recognised by the Council.

#### E&A Partnerships Ltd & Niddrie Development Company (0753)

Support the policy however, part of the Active Travel Safeguard ATSG25 runs through our site at The Wisp. We would be willing to reserve land within the development site to ensure this link could be completed at a later date. However, the strip of land to the north of the site is not owned by us. As such, it will not be possible to deliver the entirety of this proposal as part of development at the site.

#### Lady Road Investment S.A.R.L. (0625)

The policy is supported, however further dialogue over exact route locations, improvements to cycle parking and lighting along the routes and any potential impact upon Cameron Toll is requested.

#### Spokes Lothian (0545)

Encouraged to see active travel improvements as part of development projects. However, it is not clear that all development proposals have been sufficiently fully assessed for

active travel potential. One example is at Leith Docks, there are no specific Active Travel connections proposed. Another is at Broomhouse Terrace. It is not clear if there will be a link to Longstone over Calder Rd (A71) Furthermore, whilst it is positive to see these proposals there appears to be a disconnect from these and wider active travel network connections and integration of active travel along arterial routes.

There are only two active travel safeguards-Local connection/entry points shown in supporting documentation. One at West Granton and the other from Yeaman Place (Polwarth) to Union Canal. More should be included in the plan. The connection around Leith Docks appears to now be omitted. This is removing the ambition for a continuous off-road coastal connection between Western Harbour and Seafield.

Spokes supports but would like to see more information on certain hubs identified in the City Plan 2030. These hubs also do not appear to be in the city centre, public transport hubs or at other major development sites such as Western Harbour, International Gateway or retrospective to existing areas where active travel could be further encouraged and enabled.

Spokes is very concerned at the lack of mention of the following in City Plan 2030; Cycling by Design, Workplace Parking Levy (WPL) and wider premises levy, Active Freeways, Minimal reference to Edinburgh Design Guidance, Background data, Bringing planning approvals into line with Council policies, Coastal Path East – West, South Suburban Railway Stations.

Andy Agnew (0562)

The policy is supported. However, the provision of active travel should mention micromobility such as electric scooters. Active travel infrastructure will need to cater for scooters either in their own lanes or sharing cycle lanes.

Maciej Malaszuk (0179)

The policy is supported. However, the plan should have more active travel off road cycle routes linking Morningside with surrounding areas.

Shelagh Sharp (0111)

The policy is supported. However, it should be ensured that cycling routes have protected/segregated lanes for cyclists and that pedestrians are also protected from motorised and cycle traffic. More needs to be done to create safe cycle routes from Fairmilehead and Frogston areas in towards Morningside and then from there into the city centre.

Gordon McKay Brown (0573)

The policy is supported. However, I think we need to be as transformative as Paris with our active travel. Morningside/Brunsfeld would be incredible places to be and shop if only essential traffic passed through (public transport/emergency services) with the rest of the space given up to pedestrians and cyclists. It looks like there are no proposals to make these areas safer to cycle reducing the likely success of the 20 minute community.



David Bentley (0203)

Supports the policy. However, there are not enough active travel routes proposed and there is nothing in the south of the city, - Comiston, Fairmilehead, Swanston - and very little in adjoining areas such as Oxfangs and Morningside.

Deirdre Henderson (0727)

Supports the Policy. However, it is important that active travel does not make areas like the city centre hostile to residents living there, particularly to disabled and older people, and those that support them. Car free areas, like George Street can feel dangerous at night due to a lack of passing traffic.

The infrastructure being designed in the city centre appears to be for tourists and visitors from outside the city centre, making it less and less possible for residents to live there. The buses have areas severely lacking in services e.g. the whole of the High Street and Dumbiedykes. This needs addressed. The disused railway lines should be used for accessible transport, where possible, with lifts at station points to reduce the on street traffic and speed up travel times.

Miller Homes Limited. (0256)

The Action Programme identifies that the suggested route of ATSR11 (Currie to Heriot-Watt) passes over land owned by the Council and university, and that funding and the delivery timescale of this route is to be confirmed. However, it should be noted that this route can be fully incorporated into the proposal at Riccarton Village which can provide a direct pedestrian / cycle connection between Curriehill Station and Riccarton University Campus and Business Park.

The Action Programme suggests that ATSG17 (off road alternative to network route 75) passes over land owned by the Council and is not linked to any proposal within the City Plan and the delivery timescale is to be confirmed, albeit it should be noted that the proposals at Riccarton Village could contribute towards the delivery of this route.

Katie Soane (0260)

It is indicated that City Plan should address the following issues with Active Travel routes:

- they are not continuous connection to the existing network or people desire lines
- the missing equality act compliant ramped access from Newhaven Road to Warriston active travel path.
- the proposed (and welcomed) Powderhall active travel path northern end does not connect to the existing path network at the southern end of Chancelot path
- H44 does not protect the existing water of leith path as runs along the northern edge of the site as it connects to the eastern foot bridge that is shown as part of the route.
- H47 does not include the existing water of leith route that along its southern boundary this needs to be protected along with the western footbridge.

Morag MacLean (0326)

Any infrastructure or plans that are intended to be used by cyclists should be checked over by people that actually cycle. All infrastructure should be designed in a way that anyone would feel confident their 7 year old could safely use it. If it's not safe, easy to use, logical, and joined up then it's a waste of time. There are loads of examples all over Edinburgh that make cycling dangerous or inconvenient but with a few tweaks could be more accessible.

**Modifications sought by those submitting representations:**

**General Active Travel Comments**

Joseph Coulson (0025)

No modifications specified but it is indicated the plan will leave a city which is noisier, dirtier, and less efficient.

Lennie O'Hara (0027)

No modification specified but it is indicated that money should be spent on making Edinburgh better, not worse.

Cynthia Shuken (0632)

No modification specified but it is indicated an increase in bus stops and the frequency of buses on most routes would be of benefit and would be more likely to tempt people out of cars. All of the physical spaces for people barriers should be removed, Sunday free parking reinstated.

Robert Anderson (0775)

No modification specified but it is indicated that the plan should make a distinction for the new electric mopeds which are now available. Currently, there is little provision made for these vehicles. The definition of a cycle needs to be better defined.

Genna Spears (0081)

No modification specified but it is indicated that pavements need urgent repair rather a dedicated cycle lane. Do not remove parking spaces and parking permits.

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

No modification specified but it is indicated that cycling suffers from the fact that considerable distances may need to be travelled due to past approvals where workplaces, shops, etc. have been built at greater distances than 800m from people's homes and for much of the time, Edinburgh is a wet, windy, cold and hilly city.

Archie Clark (0003)

The plan should show how Mobility hubs are to be planned. It should be emphasised

that 'Wheeling' refers to wheelchairs, not to scooters, whether motorised or not.

Lynn Grattage (0362)

Paragraph 2.119 should read "All development must prioritise walking, wheeling and cycling to local services and through areas, joining with current routes. These routes should be laid out first, then any roads and other infrastructure laid out afterwards, to ensure that the walking, wheeling and cycling routes are the most direct and easy to use, and the driving routes have to go round them. Paragraph 2.119 should not say "wherever possible", it should read "connections have to be made to the wider network of protected cycleways"

The policy should talk about improvements on existing housing developments. These should all have either off road cycle routes or cycle priority.

Michael Ramsey (0011)

No modification specified but it is indicated that the inclusion of the orbital active travel routes around the city and inclusion of the Cammo Walk active travel route is recommended.

**INF 10- Cycle and Footpath Network. (Tables- 3-5)**

William Moyes (0305)

No modification specified but it is indicated that the strategy must recognise and acknowledge that the needs of pedestrians and cycles are not always identical and often they conflict. Pedestrians should be completely physically separated from cycling or other wheeled traffic. Local residents need to be given more detail in terms of the active travel proposals in order to make a considered judgement on the plan.

Bo Adams (0363)

There needs to be more safe segregated active infrastructure on the A701 from the Park and ride in Straiton all the way to the city centre. There also needs to be more safe segregated active infrastructure on Burdiehouse and Liberton roads. The infrastructure on Frogston road needs to be more visionary, the Frogston Road cycle lane should connect with Captains Road and Liberton.

Crosswind Developments Ltd (0184)

Active travel safeguards through West Edinburgh should be shown on Map 1.

Policy wording should be amended as below:

"b. unacceptably impedes the continuity of the core path network or off-road network generally,"

Friends of Cammo (0387)

The policy should give priority to securing the active travel route through the former Craigiehill army base.

#### University of Edinburgh (0464)

No modification specified but it is indicated that further dialogue and information is requested with the City of Edinburgh Council on the exact route locations and impact upon the University of Edinburgh's campus locations.

#### Shortbread House of Edinburgh Ltd (0619)

No modification specified but it is stated that the closure of Jane Street would mean that there is no longer safe access for lorries to come on and off the site at 25 Tennant Street. This would mean that we are no longer able to operate our business on this site safely.

The proposed active travel route through our car park at 25 Tennant Street. (ATPR35-Leith Walk to Bowling Green Street) must be reconsidered.

#### Barratt David Wilson Homes (0677)

No modification specified but it is indicated that land control constraints may make (Policy Inf 10) impossible to implement.

#### Archie Clark (0003)

Separate large maps indicating the proposals and safeguards shown under table 3, 4 and 5 is needed.

Of particular (but not exclusive note) are ATSR3, ATSR6 – (West Edinburgh Link – is shown as 'New walking, cycling and public spaces in East Craigs, South Gyle, Bankhead, Sighthill and Wester Hailes linking with Edinburgh Park/the Gyle'. But as this ends up at Lanark Road opposite Hailes Gardens and appears to run the length of Wester Hailes Road from the Clovenstone Roundabout over the canal and northwards across the Calder Road, the description above should be amended to read "...Wester Hailes linking Edinburgh Park/the Gyle to Lanark Road."

ATSR11 (Heriot-Watt to Currie – which appears unnecessary given there already is a footpath and most access is from Riccarton Mains Road on the east side of the estate). What form does this active travel project take?

ATSR12 (A71 South Livingston to West Edinburgh), ATSR16 (Lanark Road/Slateford Road – which the past year has proved is neither popular nor necessary).

In terms of Table 5 - Active Travel Safeguards – local connections, ATSG8 – Inglis Green cycle link to New Water of Leith Bridge doesn't appear to feature on the maps.

ATSG17 – Off-road alternative to NCNR75 at Newmills may be of use for a short distance at its south end though it would need to run under Lanark Road West to connect to the Water of Leith Walkway to be useful. It is unclear what purpose it would serve otherwise.

Protected cycleways should include a pedestrian/cycle route, an 'Education corridor', connecting WHEC to Currie Community High School and Balerno High School, the

Heriot-Watt University and the primary schools along the route so as to reduce the volume of traffic on the Lanark Road/Lanark Road West.

The connection between Lanark Road and the Calder Road would be best going through Wester Hailes (as CEC leaflet "On Foot – By Bike") from Lanark Rd via Clovenstone/ Wester Hailes/ Hailesland/ along the canal to link with the route to WHEC/ parallel to Wester Hailes Road to the Calder Road Roundabout underpass/ east parallel to Calder Road to Stevenson College. That way it avoids problems crossing in the vicinity of the Clovenstone roundabout.

The "Strategic Active Travel Safeguard" alongside the A71 is not needed as the canal towpath already provides most of the route.

Homes for Scotland (0404), Steve Loomes (0767)

No modifications specified but it is indicated that land control constraints may make this policy (Inf 10) impossible to implement.

Water of Leith Conservation Trust (0392)

A foot/cycleway should be included over the water of Leith in Slateford / Longstone linked to Sainsburys /Asda and the developments at New Mart Road and Inglis Green Road.

Juniper Green & Baberton Mains Community Council (0306)

No modification specified but it is indicated that the policy does not recognise that Edinburgh is not always hospitable for cycling and the aged, the infirm and mothers with young children are unlikely to take to their bikes.

Edinburgh Airport Limited (0761)

Bullet point b should be reworded as follows:

"b. unacceptably impedes the continuity of the core path network or off-road network generally"

Cramond & Barnton Community Council (0243)

Map 2 (p. 10) & Map 8 (p. 31). Active Travel Project and Safeguards should include -

- a. Cammo Walk Active Travel Project
- b. Strategic Orbital Active Travel Corridor around the periphery of the City (cf. City Bypass)

Living Streets Edinburgh Group (0486)

The policy should be retitled "Footpath and Cycle Network" to properly reflect the transport hierarchy.

Reword policy as follows:

"Development proposals must design for and deliver direct connections to adjacent segregated active travel infrastructure and/or the off-road cycle and footpath network. Development proposals must address improvements to safe walking routes ....."

Add to the list of development which will not be supported to include cases where adjoining footpaths are already inadequate or where development will reduce the width or adversely impact on other essential characteristics of existing footpaths.

We would like to see a preamble for all proposals that clearly sets out the Transport Hierarchy and the priority afforded to walking within it. We expect to see a range of proposals and investment

CALA Management Ltd (0465), Hallam Land Management (0599)

All proposals set out in tables 3 -5 of the Proposed LDP should be reviewed based on a reliable impact assessment, taking into account the issues raised in the representation to the Transport Appraisal.

Miller Homes Ltd. (0649)

All proposals set out in tables 3 -5 of the Proposed LDP should be reviewed based on a reliable impact assessment, taking into account the issues raised in the representation to the Transport Appraisal.

Table 4 of the Proposed LDP should, therefore, be amended to include the delivery of a Mobility and Neighbourhood Hub at land South of Lang Loan.

Louise Baker (0773)

No modification specified but it is indicated that accessibility within the city for walking and wheelchair users could be improved by careful consideration of the placement of street furniture and proper maintenance of footpaths and for building projects the duration the impact on pedestrians should be given more consideration when planning permission is being granted.

Stirling Developments Limited (0303)

Additional provision for active travel along the A8 to Newbridge needs to be included within the plan

Edinburgh Access Panel (0620)

The plan should state that a cycle lane or cycle track or cycle path should have effective segregation including a level-change of at least 50mm.

Leith Central Community Council (0614)

Options for a future active travel route at high level safeguarded ("Leith Walk Highline") to support connections from Pilrig Park and the North Edinburgh cycle network to East Edinburgh and the coast line between Marine Esplanade and Portobello.

No further modification specified but it is indicated that the plan should state that all new

developments should always increase and add to permeability and connectivity for active travel.

#### The Davidson's Mains and Silverknowes Association (0454)

ATSG1 Active Travel Safeguard - Blackhall Path westwards extension from Silverknowes Road Bridge to Cramond Road South should be given a higher priority to be included as a specific development proposal as part of the plan .

ATSR1 - Edinburgh Waterfront Promenade should be extended to Queensferry with the provision of a crossing of the River Almond at Cramond Harbour.

#### Forth Ports Limited (0496)

'Active travel safeguards' (both strategic and local) and 'indicative schools proposals' shown on map 8 (page 31) within the Port of Leith should be removed and relocated to a location outside of the operational port estate, the boundary of which is shown on appendix 2.3 table 3 page 166.

Proposal ATSR1 – Edinburgh Waterfront Promenade should be re-routed. Amend description text to address the requirement to re-route around the operational Port of Leith estate boundary shown at Appendix 2.3 as follows,

"Form a continuous walkway/cycleway extending for almost 17km from Joppa in the east to Cramond in the West. The route will not pass through the Port of Leith operational port estate and will require to be routed around its landward boundaries."

Remove Strategic Active Travel and Safeguards from the operational port estate boundary which is shown on Appendix 2.3, Page 9, Map 1 – The City Plan Spatial Strategy

Relocate Strategic Active Travel Project an Safeguards and Active Travel Safeguards from operational port estate boundary which is shown on Appendix 2.3, Page 10, Map 2 – The City Plan Spatial Strategy

Remove and relocate 'active travel safeguards' (both strategic and local) and 'indicative schools proposals' shown on map 8 (page 31) within the Port of Leith to a location outside of the operational port estate, the boundary of which is shown on Appendix 2.3.

Maps 14, 15, 16 and 17, pages 47 to 49, require to be revised, re-routing footpath and cycle connections to exclude the operational land within the Port estate.

Northern and Eastern Docks Development Principles (page 49) amend bullet point d to recognise that cycle and pedestrian routes are required to be routed around the operation Port of Leith estate with the following text, "Cycle and pedestrian routes will require to be routed around the boundary of the operational Port of Leith estate."

Amend policy Inf 10 to recognise that it will not always be possible to provide active travel routes as identified in the proposed Plan. The following revision to the Policy is proposed.

Development will not be supported which would:

- a. prevent the implementation of proposed cycle paths and pedestrian/wheeling routes

shown on the Proposals Map and Part 4, safeguarded routes identified in this plan, other routes identified in the Council's Active Travel Action Plan, or other routes identified through Place Policies and Development Principles or Place Briefs following community consultation, unless it is demonstrated that the routes cannot be delivered. Alternative routes may be required where it is not possible to deliver the proposed routes."

#### Tarmac (0244)

Omit the words 'direct' and 'adjacent segregated' in the first sentence of policy Inf 10.

Omit 'including these identified in school travel plans where relevant' in the second sentence of policy Inf 10 as this is unnecessary addition to the existing policy.

#### Inverdunning (Hatton Mains) Ltd (0427)

A New Mobility Hub at Hatton Village should be added to table 4 (Active Travel Proposals), to reflect proposed new Hatton Village allocation.

#### Hallam Land Management (0615)

Omit the words 'direct' and 'adjacent segregated' in the first sentence of policy Inf 10.

Omit 'including these identified in school travel plans where relevant' in the second sentence of policy Inf 10 as this is unnecessary addition to the existing policy.

#### E&A Partnerships Ltd & Niddrie Development Company (0753)

No modifications specified but it is indicated that issues with land ownership mean it will not be possible to deliver the entirety of the active travel route.

#### Lady Road Investment S.A.R.L. (0625)

No modifications specified but it is indicated that proposed routes run near to clients land. Further dialogue over exact route locations, improvements to cycle parking and lighting along the routes and any potential impact upon Cameron Toll are requested.

#### Spokes Lothian (0545)

The following Access Points should be assessed for inclusion within the plan; Ferry Road Morrisons supermarket on the NEPN near Ainslie Park, Sauchiebank to Roseburn (for continuous Roseburn to Canal route), 64 Gilmerton Dykes Street (Kilngate Brae to Gilmerton Dykes Street connection), Blackford Glen Road to King's Buildings, Cramond Road South to the Blackhall Path.

CEC to review all brownfield sites for integration into the existing and newer 'Travelling Safely' (SfP) active travel routes.

More information should be provided in relation to the Broomhouse Terrace mobility hub, Redford Barracks mobility hub, Astley Ainslie mobility hub, Granton mobility Hub, Granton Square mobility Hub, Bonnington mobility hub, Seafield mobility hub, Fettes



Avenue mobility hub, BioQuarter mobility hub 1, BioQuarter mobility hub 2.

All active travel proposals should be designed not just as standalone projects, but integrated into a safe, welcoming and connected city-wide network which includes convenient and direct access to such development areas.

The plan should have greater reference to the recently published update to Transport Scotland 'Cycling by Design' document in City Plan 2030.

Workplace Parking Levy: The City Plan should commit the Council to continue seeking such powers and based planning based on it being in place as soon as possible.

Active Freeways should be included in the City Plan.

More reference to Edinburgh Design Guidance is required:

More information and data should be available to help inform an Active Travel forecast of the proposals in the City Plan 2030.

Andy Agnew (0562)

The policy should acknowledge micromobility such as electric scooters.

Maciej Malaszuk (0179)

No modifications specified but it is indicated that the plan should have more active travel off road cycle routes linking Morningside with surrounding areas.

Shelagh Sharp (0111)

The policy should ensure that cycling routes have protected/segregated lanes for cyclists and that pedestrians are also protected from motorised and cycle traffic. More safe cycle routes are required from Fairmilehead and Frogston areas in towards Morningside and then from there into the city centre.

Gordon McKay Brown (0573)

Morningside/Bruntsfield should be made car free with the rest of the space given up to pedestrians and cyclists.

David Bentley (0203)

More active travel routes should be proposed, especially in the south of the city and in adjoining areas such as Oxbgangs and Morningside.

Deirdre Henderson (0727)

Certain areas of the City like High Street and Dumbiedykes require additional bus services. The disused railway lines should be used for accessible transport, where possible, with lifts at station points to reduce the on street traffic and speed up travel times. It is indicated that active travel measures must not make areas like the city centre hostile to residents living there.

Miller Homes Limited. (0256)

No modifications specified but it is indicated that the proposals at Riccarton Village could also contribute towards the delivery of ATSR11 and ATSG17

Katie Soane (0260)

No modifications specified but it is indicated that City Plan should address the following issues with Active Travel routes:

-they are not continuous connection to the existing network or people desire lines

-the missing equality act compliant ramped access from Newhaven Road to Warriston active travel path.

-the proposed (and welcomed) Powderhall active travel path northern end does not connect to the existing path network at the southern end of Chancelot path

- H44 does not protect the existing water of leith path as runs along the northern edge of the site as it connects to the eastern foot bridge that is shown as part of the route.

- H47 does not include the existing water of leith route that along its southern boundary this needs to be protected along with the western footbridge.

Morag MacLean (0326)

No modification specified but it is indicated that any infrastructure or plans that are intended to be used by cyclists should be checked over by people that actually cycle. If it's not safe, easy to use, logical, and joined up then it's a waste of time. There are loads of examples all over Edinburgh that make cycling dangerous or inconvenient but with a few tweaks could be more accessible.

**Summary of responses (including reasons) by planning authority:**

**General Active Travel Comments**

Joseph Coulson (0025)

One the key Outcomes of City Plan (CD001) is by 2030, we want Edinburgh to be a City where you don't need to own a car to move around. The plan aligns with the National Transport Strategy 2 (CD110), the draft National Planning Framework 4 (CD099) and the Council's approved local transport strategy, the City Mobility Plan (CMP) (CD062) which puts sustainable modes of movement (walking, wheeling, cycling and public transport at the top of the transport hierarchy and private car use at the bottom.

Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Paragraph 2.118 states that we want to see development prioritising walking and wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs. The CMP has been prepared alongside City Plan 2030 to help Edinburgh connect through a safer and more inclusive

carbon neutral transport system- delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents. The Council is also currently working on a new Active Travel Action Plan (ATAP) and a Public Transport Action Plan (PTAP) to replace the current ATAP/PTAP (CD075) & (CD169). **No modification proposed.**

Lennie O'Hara (0027)

Representations in relation to the consultation process are covered under issue 39. One the key Outcomes of City Plan is by 2030, we want Edinburgh to be a City where you don't need to own a car to move around. The plan aligns with the Nation Transport Strategy 2 which puts sustainable modes of movement at the heart of the transport hierarchy with walking, cycling and wheeling at the top and private car use at the bottom. Paragraph 2.113 of the plan states that to address the climate emergency, the plan aims to reduce transport emissions and avoids adding to congestion by managing travel demand and promoting public transport.

The City Mobility Plan (CMP) (CD062) has been prepared alongside City Plan 2030 (CD001) to help Edinburgh connect through a safer and more inclusive carbon neutral transport system- delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents. The plan aligns with the Nation Transport Strategy 2 which puts sustainable modes of movement at the heart of the transport hierarchy with walking, cycling and wheeling at the top and private car use at the bottom.

Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Paragraph 2.118 states that we want to see development prioritising walking and wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs. The layout of proposed active travel routes has been informed by the City Plan TA (CD014), the CMP, ESSTS (CD071), WETA 2016 refresh (CD073) and WETIP (CD072).

The plan cannot control the behaviours of road users. **No modification proposed.**

Cynthia Shuken (0632)

One the key Outcomes of City Plan is by 2030, we want Edinburgh to be a City where you don't need to own a car to move around. The City Mobility Plan (CMP) (CD062) has been prepared alongside City Plan 2030 to help Edinburgh connect through a safer and more inclusive carbon neutral transport system- delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents. The plan aligns with the Nation Transport Strategy 2 (CD110) which puts sustainable modes of movement at the heart of the transport hierarchy with walking, cycling and wheeling at the top and private car use at the bottom. Numerous reports like the one carried out by Living Streets have shown that safe and pleasant places, where people walk to and stay longer, are economically vibrant (The Pedestrian Pound) (CD145).

Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Paragraph 2.118 states that we want to see development prioritising walking and wheeling and

cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs. The infrastructure proposals shown in part 4 of the plan, which include proposed additional bus routes, will provide people with accessible, frequent public transport options as an alternative to the car. **No modification proposed.**

Robert Anderson (0775)

The detailed design of active and public transport routes is a project level matter. Active travel routes shall be designed on a case by case basis and will align with the Council's design guidance and street design guidance which has specific information in relation to street design guidance, footways and promoting pedestrian movement.

The planning system cannot control or regulate the type or use of vehicles. In line with National Transport Strategy 2 (CD110), the plan advocates the transport hierarchy with walking cycling and wheeling at the top. **No modification proposed.**

Genna Spears (0081)

One the key Outcomes of City Plan is by 2030, we want Edinburgh to be a City where you don't need to own a car to move around. Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Paragraph 2.118 states that we want to see development prioritising walking and wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs. Any modifications to parking provision will be subject to other Council processes and consultation, however City Plan accords with the CMP (CD062) in terms of managing private car use and public space. Pavement management is a matter for the Roads Authority. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306) Archie Clark (0003)

City Plan (CD001) proposes a measure of infrastructure proposals that will help encourage people to walk and cycle. It also proposes a number of public transport measures, like expanded tram services and new orbital bus routes, for people who are unwilling or unable to cycle or have to do their shopping or other activities that might require public transport. **No modification proposed.**

Archie Clark (0003)

The Action Programme for the proposed plan (CD008) provides further information relating to mobility hubs as does the CMP (CD062). Further details will be available through future action plans relating to the plan and the CMP which are currently being worked on.

The glossary of the plan provides a definition of Wheeling. **No modification proposed.**

Lynn Grattage (0362)

The Council considers the wording of paragraph 2.119 is suitably robust whilst still

providing the degree of flexibility that is required when a planning application is assessed. **No modification proposed.**

Michael Ramsey (0011)

Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. The CMP (CD062) has been prepared alongside City Plan 2030 (CD001) to help Edinburgh connect through a safer and more inclusive carbon neutral transport system- delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents. The Council is also currently working on a new Active Travel Action Plan (ATAP) and a Public Transport Action Plan (PTAP) to replace the current ATAP/PTAP (CD075) & (CD169). **No modification proposed.**

#### **INF 10- Cycle and Footpath Network. (Tables 3-5)**

William Moyes (0305)

Paragraph 2.118 of the plan states that the Council want to see all development, prioritising walking, wheeling and cycling.

Where active travel routes are proposed for developers to deliver they will have to meet the Council's design guidance and street design guidance which has specific information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the exact design and type of segregation of cycle route on street will be finalised as part of the Active Travel Action Plan (in preparation). Once this is finalised, and the type of cycle segregation design is known, this can be reflected in iterations of the City Plan Action Programme (CD008). Further details of the proposed layout of active travel routes can also be found in the interactive maps. **No modification proposed.**

Bo Adams (0363)

Part 4, Tables 3-5 of the plan focuses on active travel infrastructure proposals. The thorough active travel proposals highlighted in part 4, Tables 3-5 of the plan have been informed by the plan TA (CD014), the CMP (CD062), ESSTS (CD071), WETA 2016 refresh (CD073) and WETIP (CD072). **No modification proposed.**

Friends of Cammo (0387)

The support is noted. The future development of the active travel routes proposed shall be established in the annually updated action programme for the plan (CD008). **No modification proposed.**

Crosswind Developments Ltd (0184)

Map 1 is a high level illustrative spatial strategy. Map 24 clearly indicates new, proposed, active travel routes.

The Council considers the wording of criterion (b) of Inf 10 is appropriate and will enable

the Council to ensure that no impediment to delivery arises. **No modification proposed.**

University of Edinburgh (0464)

The support in principle is noted. The Council will continue in dialogue with the University through the Action programme. **No modification proposed.**

Shortbread House of Edinburgh Ltd (0619)

25 Tennant Street forms part of place proposal 7 (Stead's Place) for housing led mixed-use development. The active travel route indicated has been safeguarded to ensure that if the site is redeveloped then an adequate active travel link through the site could be provided. **No modification proposed.**

Barratt David Wilson Homes (0677)

Policy Inf 10 states that development proposals must design for and deliver direct connections to, adjacent, segregated active travel infrastructure and/or the off road cycle and footpath network. Given that developments must only deliver connection to adjacent infrastructure or networks it is likely that connections will be made to land either owned by developers or council owned land. Therefore, there should be no obstruction to delivery in most circumstances. In occasions where land ownership concerns cannot be resolved then a developer contribution may be required in line with policy Inf 3.

It must also be noted that the proposed routes that are shown in the plan are indicative at this stage and will be delivered through project level work. **No modification proposed.**

Archie Clark (0003)

The proposed and safeguarded active travel routes highlighted in table 3 of the plan have been informed by the plans TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). Further details regarding mobility hubs and protected cycleways is available in the city plan action programme (CD008) and additional details will be forthcoming in future action programmes. **No modification proposed.**

Homes for Scotland (0404), Steve Loomes (0767)

City Plan (CD001) proposes a measure of infrastructure proposals that will help encourage people to walk and cycle. However, it also proposes a number of public transport measures, like expanded tram services and new orbital bus routes, for people who are unwilling or unable to cycle or have to do their shopping or other activities that might require public transport.

Policy Inf 10 states that development proposals must design for and deliver direct connections to, adjacent, segregated active travel infrastructure and/or the off road cycle and footpath network. Given that developments must only deliver connection to adjacent infrastructure or networks it is likely that connections will be made to land either owned by developers or council owned land. Therefore, there should be no obstruction to delivery in most circumstances. In occasions where land ownership concerns cannot be resolved then a developer contribution may be required in line with policy Inf 3. It must also be

noted that the proposed routes that are shown in the plan are indicative at this stage and will be delivered through project level work. **No modification proposed.**

Water of Leith Conservation Trust (0392)

Table 5 of the plan (Active Travel Safeguards- Local Connections) highlights (ATSG8) Inglis Green cycle link, new Water of Leith Bridge. **No modification proposed.**

Edinburgh Airport Limited (0761)

The Council's considers that the wording of criterion (b) of Inf 10 is appropriate and will enable the Council to ensure that no impediment to delivery arises. **No modification proposed.**

Cramond & Barnton Community Council (0243)

The proposed and safeguarded active travel routes highlighted in table 3 of the plan have been informed by the plans TA (CD014), the CMP (CD062), ESSTS (CD071), WETA 2016 refresh (CD073) and WETIP (CD072). **No modification proposed.**

Living Streets Edinburgh Group (0486)

Paragraph 3.209 makes it clear that increasing trips made by walking, wheeling, and cycling is central to the Sustainable Transport Hierarchy. This is also key to the Council achieving its aim to reduce the number of car kilometres travelled citywide. No modification proposed, however should the reporter be so minded the title could be altered to "Footpath and Cycle Network" to provide more clarity.

The Council considers the wording and title of policy Inf 10 to be appropriate and robust and it will ensure the delivery of the strategy. **No modification proposed.**

CALA Management Ltd (0465), Hallam Land Management (0599)

The Transport Appraisal (CD014) that supports the Proposed LDP was undertaken based on guidance from Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) (CD112). Evidence to inform the decision making process was appraised against a common set of aspirational Transport Planning Objectives and used a range of traffic modelling tools.

Robust 'off the shelf' modelling tools for active travel are less common than for public transport and private vehicles. Therefore, trip generation for active travel was based on published Transport Assessments of specific developments or data on trip patterns of similar sites elsewhere in the UK. Appraisal of active travel interventions relied on data from best practice which identifies what could be expected if high quality new active travel infrastructure is provided on urban corridors which currently have no dedicated provision. Although total active travel volumes may not be known, these modes are at the top of the sustainable travel hierarchy and at the forefront of local and national government policy. Therefore, provision of quality active travel infrastructure at new development sites is a priority. Further details relating to the cost of these safeguards and proposals shall be provided in future action programmes and in project level works. It should also be noted that many of the infrastructure actions proposed are directly linked to developments and

are shown in place policies and associated maps. These are required to ensure that the proposal is acceptable in terms of mitigating transport impact and would be expected to be delivered with the site. **No modification proposed.**

Miller Homes Ltd. (0649)

The Transport Appraisal (CD014) that supports the Proposed LDP was undertaken based on guidance from Transport Scotland's Development Planning and Management Transport Appraisal Guidance (DPMTAG) (CD112). Evidence to inform the decision making process was appraised against a common set of aspirational Transport Planning Objectives and used a range of traffic modelling tools.

Robust 'off the shelf' modelling tools for active travel are less common than for public transport and private vehicles. Therefore, trip generation for active travel was based on published Transport Assessments of specific developments or data on trip patterns of similar sites elsewhere in the UK. Appraisal of active travel interventions relied on data from best practice which identifies what could be expected if high quality new active travel infrastructure is provided on urban corridors which currently have no dedicated provision. Although total active travel volumes may not be known, these modes are at the top of the sustainable travel hierarchy and at the forefront of local and national government policy. Therefore, provision of quality active travel infrastructure at new development sites is a priority. Further details relating to the cost of these safeguards and proposals shall be provided in future action programmes and in project level works. It should also be noted that many of the infrastructure actions proposed are directly linked to developments and are shown in place policies and associated maps. These are required to ensure that the proposal is acceptable in terms of mitigating transport impact and would be expected to be delivered with the site.

The Council's response to proposed additional greenfield sites is covered in detail in issue 9. **No modification proposed.**

Louise Baker (0773)

The proposed and safeguarded active travel routes highlighted in table 3 of the plan have been informed by the plans TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072).

The detailed design of active travel routes is a project level matter. Where active travel routes are proposed for developers to deliver they will have to meet the Council's design guidance and street design guidance which has specific information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the exact design and type of segregation of cycle route on street will be finalised as part of the Active Travel Action Plan (in preparation) (CD008). Once this is finalised, and the type of cycle segregation design is known, this can be reflected in iterations of the City Plan Action Programme. Further details of the proposed layout of active travel routes can also be found in the interactive maps.

The Roads Authority are responsible for the maintenance of roads and pavements and will provide comment at the planning application stage. Speed limits are out with the remit of the City Plan. **No modification proposed.**



#### Stirling Developments Limited (0303)

The proposals set out in tables 3 – 5 and 8 of the City Plan 2030 Proposed Plan (Proposed LDP) have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). Further considerations will be made as the active travel action plan develops (CD008). **No modification proposed.**

#### Edinburgh Access Panel (0620)

The detailed design of active travel routes is a project level matter. Where active travel routes are proposed for developers to deliver they will have to meet the Council's design guidance (CD047) and street design guidance (CD170) which has specific information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the exact design and type of segregation of cycle route on street will be finalised as part of the Active Travel Action Plan (in preparation) (CD008). Once this is finalised, and the type of cycle segregation design is known, this can be reflected in iterations of the City Plan Action Programme. Further details of the proposed layout of active travel routes can also be found in the interactive maps. **No modification proposed.**

#### Leith Central Community Council (0614)

The Council consider that policy Inf 10 is appropriate and will enable the Council to ensure that no impediment to delivery arises. The proposals set out in tables 3 – 5 of the City Plan 2030 have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). **No modification proposed.**

#### The Davidson's Mains and Silverknowes Association (0454)

The proposals set out in tables 3 – 5 of the City Plan 2030 have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). **No modification proposed.**

#### Forth Ports Limited (0496)

It is noted that the Proposal ATSR1 – Edinburgh Waterfront Promenade is already included in the adopted Local Development Plan under (T7) Edinburgh Waterfront Promenade which has been through examination. An active travel route is not incompatible with the uses proposed in EW1d (Seafield). ATSR1 will not pass through the northern and eastern docks area (EW 1e) The Council considers the wording of criterion (a) of policy Inf 10 is robust as is the wording of criterion (d) of the Northern and Eastern Docks Development Principles. **No modification proposed.**

#### Tarmac (0244)

Policy Inf 10 states that development proposals must design for and deliver direct connections to, adjacent, segregated active travel infrastructure and/or the off road cycle and footpath network. Given that developments must only deliver connection to adjacent

infrastructure or networks it is likely that connections will be made to land either owned by developers or council owned land. Therefore, there should be no obstruction to delivery in most circumstances. In occasions where land ownership concerns cannot be resolved then a developer contribution may be required in line with policy Inf 3. It must also be noted that the proposed routes that are shown in the plan are indicative at this stage and will be delivered through project level work.

The Council considers the wording of policy Inf 10 is appropriate and will enable the Council to ensure that no impediment to delivery arises.

The Council's response to proposed additional greenfield sites is covered in detail in issue 9. **No modification proposed.**

Inverdunning (Hatton Mains) Ltd (0427)

The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072).

The Council's response to proposed additional greenfield sites is covered in detail in issue 9. **No modification proposed.**

Hallam Land Management (0615)

Policy Inf 10 states that development proposals must design for and deliver direct connections to, adjacent, segregated active travel infrastructure and/or the off road cycle and footpath network. Given that developments must only deliver connection to adjacent infrastructure or networks it is likely that connections will be made to land either owned by developers or council owned land. Therefore, there should be no obstruction to delivery in most circumstances. In occasions where land ownership concerns cannot be resolved then a developer contribution may be required in line with policy Inf 3. It must also be noted that the proposed routes that are shown in the plan are indicative at this stage and will be delivered through project level work.

The Council considers the wording of policy Inf 10 is appropriate and will enable the Council to ensure that no impediment to delivery arises.

The Council's response to proposed additional greenfield sites is covered in detail in issue 9. **No modification proposed.**

E&A Partnerships Ltd & Niddrie Development Company (0753)

Proposed active travel routes and safeguards are indicative at this stage. The finalised route shall be determined through future project level decisions. In occasions where land ownership concerns cannot be resolved then a developer contribution may be required in line with policy Inf 3. **No modification proposed.**

Lady Road Investment S.A.R.L. (0625)

Support for the policy is noted as is the request for further dialogue over exact route locations, improvements and potential impact upon Cameron Toll. **No modification**

**proposed.**

Spokes Lothian (0545)

The proposals set out in part 4, tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). The Council considers that the proposals established in part 4 of the plan are fully integrated and will deliver the strategy, policies and one of the key aims of the plan which is by 2030 Edinburgh will be a city where you don't need to own a car to move around.

Where active travel proposals are proposed for developers to deliver they will have to meet the Council's design guidance and street design guidance which has specific information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the details will be finalised as part of the Active Travel Action Plan (in preparation) (CD008). Once this is finalised, this can be reflected in iterations of the City Plan Action Programme.

Paragraph 2.114 states that the plan sets out Edinburgh's mass transit network, including proposed new transport actions, including from the City Mobility Plan and the Edinburgh Sustainable Strategic Transport Strategy (CD071). The strategy is supported by the Scottish Government's National Transport Strategy 2 (CD110) and the emerging case for Strategic Transport Projects Review 2 (CD111). The Council considers the wording of policy Inf 10 is appropriate and will enable the Council to ensure that no impediment to delivery arises. **No modification proposed.**

Andy Agnew (0562)

The detailed design of active travel routes is a project level matter. The design of active travel routes shall be designed on a case by case basis and will align with the Council's design guidance and street design guidance which has specific information in relation to street design guidance, footways and promoting pedestrian movement.

The planning system cannot control or regulate the type or use of vehicles. In line with National Transport Strategy 2 (CD110), the plan advocates the transport hierarchy with walking, cycling and wheeling at the top. **No modification proposed.**

Maciej Malaszuk (0179)

The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). **No modification proposed**

Shelagh Sharp (0111)

Support for the policy is noted. The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). The detailed design of active travel routes is a project level matter. Where active travel routes are proposed for developers to deliver they will have to meet the Council's design guidance and street design guidance which has specific

information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the exact design and type of segregation of cycle route on street will be finalised as part of the Active Travel Action Plan (in preparation) (CD008). Once this is finalised, and the type of cycle segregation design is known, this can be reflected in iterations of the City Plan Action Programme.

In line with National Transport Strategy 2 (CD110), the plan advocates the transport hierarchy with walking, cycling and wheeling at the top. **No modification proposed.**

Gordon McKay Brown (0573)

Support for the policy is noted. The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). One the key Outcomes of City Plan is by 2030, we want Edinburgh to be a City where you don't need to own a car to move around.

The City Mobility Plan (CMP) has been prepared alongside City Plan 2030 to help Edinburgh connect through a safer and more inclusive carbon neutral transport system- delivering a healthier, thriving, fairer and compact capital city and a higher quality of life for all residents. The plan aligns with the National Transport Strategy 2 which puts sustainable modes of movement at the heart of the transport hierarchy with walking, cycling and wheeling at the top and private car use at the bottom.

Paragraph 2.111 of the plan states that City Plan 2030 will realise the lifelong health benefits of walking, wheeling and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable public transport. Paragraph 2.118 states that we want to see development prioritising walking and wheeling and cycling, demonstrating high public transport accessibility, restricting private car parking and encouraging shared transport through mobility hubs. The Council is also currently working on a new Active Travel Action Plan (ATAP) and a Public Transport Action Plan (PTAP) to replace the current ATAP/PTAP (CD075& CD169). **No modification proposed.**

David Bentley (0203)

Support for the policy is noted. The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). **No modification proposed**

Deirdre Henderson (0727)

Support for the policy is noted. The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). Table 6 of the plan also highlights proposed orbital bus route and improved transport connections, whilst Table 7 highlights Tram route proposals and other safeguards and table 10 shows future railway infrastructure improvement safeguards and railway halt safeguards. **No modification proposed**

Miller Homes Limited. (0256)

The proposals set out in tables 3-5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072). City Plan has not identified Riccarton Village as a proposed housing development site. The Council's response to proposed additional greenfield sites is covered in detail in issue 9. **No modification proposed.**

Katie Soane (0260)

The proposals set out in tables 3 – 5 of the City Plan have been informed by the TA (CD014), CMP (CD062), ESSTS (CD071), WETA 2016 Refresh (CD073) and WETIP (CD072).

Place 9 criterion (f) states that proposals will be expected to form convenient connections to adjacent core paths, pedestrian and cycle routes, integrating necessary changes in level.

Place 10 criterion (c) states that proposals will be expected to form new connection for active travel between consented cycle route (east of site boundary) and the existing footbridge on Water of Leith Walkway, integrating any necessary changes in level.

Place 10 criterion (d) states that proposals will be expected to provide section of new active travel route: Bonnington link East-West from Great Junction Street to Powderhall along Southern frontage.

Place 11 criterion (e) states that proposals will be expected to create a permeable network of streets and paths reinforcing key routes for active travel, in particular connections with nearby core paths.

Place 11 criterion (f) states that proposals will be expected to provide section of new active travel route: Bonnington link East-West from Great Junction Street to Powderhall through site and continuing along Newhaven Road and safe crossing.

Place 13 criterion (h) states that proposals will be expected to provide safe crossing of West Bowling Green Street to connect to Water of Leith walkway with national cycle route 75.

Place 13 criterion (i) states that proposals will be expected to integrate necessary changes in level between active travel routes and Water of Leith walkway.

Further details in relation to place 9, 10, 11 and 13 shall be provided and shall be fully assessed at the project level stage. **No modification proposed.**

Morag MacLean (0326)

Where active travel routes are proposed for developers to deliver they will have to meet the Council's design guidance (CD047) and street design guidance (CD170) which has specific information in relation to cycle lanes, segregated cycle lanes and footways. Where the active travel proposals are likely to be delivered by the Council and funded in part by developer contributions, the exact design and type of segregation of cycle route on street will be finalised as part of the Active Travel Action Plan (in preparation) (CD008). Further details of the proposed layout of active travel routes can also be found in the interactive

maps. The layout and design of active travel routes will also be considered at the project level stage. **No modification proposed.**

#### **INF 10- Cycle and Footpath Network**

Grange/Prestonfield Community Council (0192), Portobello Amenity Society (0612), Katherine Kennedy (0569), Dave Berry (0463), NatureScot (0528), Hillend Leisure Ltd (0080), Liberton & District Community Council (0084), SEPA (0012), Mike Richardson (0109), Alasdair Gillies (0035), Chris Byrne (0297), Andy Inglis (0138)

Support noted

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 34</b>	<b>Resources and Services</b>			
<b>Development plan reference:</b>	Part 3: pages 131-133	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Alasdair Gillies (0035)  Archie Clark (0003)  Barratt David Wilson Homes (0677)  Cockburn Association (0777)  Councillor Neil Ross (0610)  Crosswind Developments Ltd (0184)  Diana Cairns (0452)  Edinburgh World Heritage (0339)  Forth Ports Limited (0496)  Frances Guy (0589)  Gordon Drummond (0382)  Grange/Prestonfield Community Council (0192)  Hallam Land Management (0615)  Homes for Scotland (0404)  Juniper Green &amp; Baberton Mains Community Council (0306)  Leith Central Community Council (0614) </td> <td> Leith Harbour and Newhaven Community Council (0776)  Morag MacLean (0326)  Mr Rodger Thomas (0345)  NatureScot (0528)  Network Rail (0071)  Philip Endecott (0079)  Portobello Amenity Society (0612)  RSPB (0648)  Scottish Government - Planning and Architecture Division - Development Plans Team (0309)  Scottish Water (0342)  SEPA (0012)  Stephen Ian Hawkins (0469)  Steve Loomes (0767)  Stirling Developments Limited (0303)  Tarmac (0244) </td> </tr> </table>			Alasdair Gillies (0035) Archie Clark (0003) Barratt David Wilson Homes (0677) Cockburn Association (0777) Councillor Neil Ross (0610) Crosswind Developments Ltd (0184) Diana Cairns (0452) Edinburgh World Heritage (0339) Forth Ports Limited (0496) Frances Guy (0589) Gordon Drummond (0382) Grange/Prestonfield Community Council (0192) Hallam Land Management (0615) Homes for Scotland (0404) Juniper Green & Baberton Mains Community Council (0306) Leith Central Community Council (0614)	Leith Harbour and Newhaven Community Council (0776) Morag MacLean (0326) Mr Rodger Thomas (0345) NatureScot (0528) Network Rail (0071) Philip Endecott (0079) Portobello Amenity Society (0612) RSPB (0648) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) Scottish Water (0342) SEPA (0012) Stephen Ian Hawkins (0469) Steve Loomes (0767) Stirling Developments Limited (0303) Tarmac (0244)
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<b>Provision of the development plan to which the issue relates:</b>	Inf 16, Inf 17, Inf 18, Inf 19, Inf 20, Inf 21, Inf 22			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>General Energy and Waste Comments</b></p> <p><u>Frances Guy (0589)</u></p> <p>The introduction should be coordinated with a commitment to promoting the circular economy and should allow for the provision of greater recycling, this is currently missing. The section needs to include commitments to recycling and how this will be managed.</p> <p><b>Policy INF 16- Sustainable Energy and Heat Networks</b></p> <p><u>Scottish Government - Planning and Architecture Division - Development Plans Team (0309)</u></p> <p>Reference should be included for development proposals to take account of the City of Edinburgh Council's Local Heat and Energy Efficiency Strategy (LHEES) and Delivery Plan, when available, and also take account of Scottish Government's Heat in Buildings Strategy and the Heat Networks Delivery Plan (when formally published). The plan should</p>				

also include a policy that fulfils the requirements of section 3F of the Town and Country Planning (Scotland) Act 1997.

It is important that local and national policies are aligned in order to ensure a consistent, co-ordinated approach to the future delivery of heat network infrastructure and wider initiatives relating to energy efficiency and heat decarbonisation. It is also important that the Council's approach to planning and development is consistent with its own wider policies (such as LHEES).

Crosswind Developments Ltd (0184)

CDL support the aims of this policy. However, the requirement for all new developments to connect to an existing or planned heat network "wherever possible to do so" does not account for feasibility, viability or costs.

Further clarification is also sought regarding the phrase "substantial developments" to ensure developers can comply with this policy. The last paragraph of the policy may be very difficult to comply with. CDL request that the council provide a clear definition of what they mean and expect when they say "when one becomes available". This should be explicit that it refers to a local network with capacity to accommodate the existing development.

Leith Harbour and Newhaven Community Council (0776)

Support the policy but suggest some modifications. Heat pumps must be used in all developments. This should be happening now and not until City Plan is approved.

Mr Rodger Thomas (0345)

Supports the policy but feels that extra emphasis should be placed on renewable heat networks as an alternative to ground and air source heat pumps in conservation areas. Many homes in conservation areas have limited exterior space for heat pumps and, when gas boilers are removed, heat networks have the potential to replace them as primary energy sources. For conservation areas, heat networks should be stressed as an alternative to existing boilers as they will do less harm to an areas character.

Barratt David Wilson Homes (0677)

Heat networks can be delivered in a variety of ways, but for housebuilders it very much depends on the scale of development, the location of the development and whether it forms part of a larger local authority scheme. There is no resistance to connecting into existing heat networks however it may not be appropriate in all locations.

Stirling Developments Limited (0303)

Policies should not place undue burden on development sites such that they become unviable. Policies must align with wider plan to ensure deliverability and flexibility.

Homes for Scotland (0404)



Heat networks can be delivered in a variety of ways, but for housebuilders it very much depends on the scale of development, the location of the development and whether it forms part of a larger local authority scheme. Unless it is a very large development with a mix of uses, housing alone will likely not secure the necessary investment to enable these.

What the housebuilding industry needs is certainty in relation to funding and how investment can be secured, assistance in improving consumer confidence to ensure uptake to secure the required returns and guidance in relation to where heat networks should be located. There is no resistance to connecting into existing heat networks however it should not be an obligation on the home building industry to provide new facilities and networks.

Steve Loomes (0767)

Heat networks can be delivered in a variety of ways, but for housebuilders it very much depends on the scale of development, the location of the development and whether it forms part of a larger local authority scheme. Unless it is a very large development with a mix of uses, housing alone will be very unlikely to secure the necessary investment to enable this provision.

What the housebuilding industry needs is certainty in relation to funding and how investment can be secured, assistance in improving consumer confidence to ensure uptake to secure the required returns and guidance in relation to where heat networks should be located. There is less resistance to connecting into existing heat networks however it should not be an obligation on the home building industry to provide new facilities and networks.

Leith Central Community Council (0614)

All new developments like wind turbines should have conditions attached to them for their recycling/dismantling once they reach their shelf life and do not operate anymore. Many private operators install the turbines on private land that they lease but do not own, potentially leaving any potential costly dismantling to the land owner. Not addressing this issue might lead to many wind turbines left abandoned in the near future.

Hallam Land Management (0615)

Hallam is supportive of this policy and is in a unique position to facilitate sustainable heat network development in this part of the city given its extensive landholdings. It intends to present viability and feasibility work in relation to future low carbon sustainable heat networks with a view to incorporating these into the development at Craigiehall.

There is however need for a clearer policy statement which meets the tests of preciseness. At present it does not give landowners/ developers clear guidance on specific development requirements or decision making criteria. This is a dynamic area of importance and Supplementary Guidance will be crucial to future development. The concept of future proofing is therefore supported.

Morag MacLean (0326)

There needs to be more detail and planning for community heating. In the next decade thousands of homes in Edinburgh will have to replace their gas boilers, but with what? Do

we really want to see everyone have to install their own individual boiler with whatever the new technology will be? Community heating works in loads of European countries, why not here? If there is a technology improvement then the community shares the cost of updating the big boiler/generator (?) for everyone instead of each individual having the burden. It would be more eco friendly to have one big boiler for lots of people rather than hundreds of individual boilers.

Cockburn Association (0777)

The Cockburn believes that it is essential if we are to meet the net-zero Caron Strategy by 2030 that we move beyond a simple operational carbon/energy perspective of development and shift to a total carbon/energy assessment, taking into account life cycle costing and embodied energy in materials. We also believe that new building including mass housing should include renewable generation technologies within the fabric, evidenced at the point of consent. Thus, the Cockburn advocates additional policies on the sustainability of building materials and building technologies as well as a policy on renewable energy generation in all new developments.

Edinburgh World Heritage (0339)

The wording of the bullet points needs to be changed, to appropriately protect the World Heritage Site from harm to its Outstanding Universal Value and mitigate the risk of de-designation. To also avoid contravention with the skyline policy and key views. The term “significant” harm is a very high test of harm and is not appropriate in this context in light of requirements to protect the historic environment.

**Policy INF 17- Safeguarding of Existing Waste Management Facilities.**

Crosswind Developments Ltd (0184)

There are currently no existing waste management facilities on site that would require safeguarding and therefore this policy should not therefore be identified on the proposals map as relevant.

Alasdair Gillies (0035)

Paragraph 2.133 is misleading. Braehead Quarry Civic Amenity site is no longer open to the public. The policies regarding waste need to be bolder. All plastic waste should be kerbside recycling.

**Policy INF 18- Provision of New Waste Management Services**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The plan needs greater alignment with para 180 of SPP. Please also note Policy 20: Zero Waste, within draft NPF4, which gives greater emphasis on supporting the circular economy and sets out the role of Local Development Plans in this.

Gordon Drummond (0382)

The infrastructure first approach to development is advocated within the strategy section of the plan. However, there is no mention of waste management in any other part of this document.

The City's waste management processes including recycling are inadequate. There does not appear to be any intention to apply improved standards to new developments. It would be far better if a coordinated, strategic plan were proposed.

#### Forth Ports Limited (0496)

Forth Ports Limited own and control land at Seafield including land identified at EW1d (safeguarded site for a waste management facility). Whilst Forth Ports support the development of such a facility they do not support the land being safeguarded for such a use.

Forth Ports will continue to retain the land at Seafield within port operational use, unless it is considered to be surplus to operational requirement. The land can accommodate business and industrial development. The development of a waste treatment facility, would be appropriate within the designated business and industrial development area however to safeguard land for a use for which there is no identified proposal or requirement could prevent alternative development proposals coming forward is not appropriate. The safeguard for a waste treatment facility should therefore be removed. There is no justification provided for the safeguarding of a waste management facility at Seafield.

#### Portobello Amenity Society (0612)

There are no safeguards for residential amenity with regards to subsection b of policy Inf 18. Those proposed for section c are too vague.

#### Diana Cairns (0452)

Does not support policy Inf 18 part b. On the proposals map, the freightliner terminal site (on Sir Harry Lauder Road, Portobello) is shown on the key as being governed by policy Econ 4 but not by policy Inf 18, which is a serious omission that might give people a false sense of security to believe that a waste management facility would not be considered on this site.

In 2010, Scottish Government Planning Reporters dismissed an appeal by Viridor for an application for a waste transfer station at this site. The appeal was dismissed on the grounds of its detrimental impact on the conservation area and residential amenity. The facility and the former freightliner terminal should be exempted from consideration for such a use due to its close proximity to a residential area, which is also an outstanding conservation area.

#### Network Rail (0071)

It should be made clear where within the Seafield Industrial Estate (EW1d) allocation, the waste management / combined heat and power safeguard is to be located. This should not be within the Network Rail land ownership. NR would not be supportive of this facility if

the designation raises issues in relation to unacceptable impacts on existing and future uses and residential amenity.

Stephen Ian Hawkins (0469)

Policy Inf 18 permits the change of use of land designated business and industry to a waste management facility. The protection of amenity for residents in urban areas or adjacent to industrial areas should be protected from the adverse effect of waste treatment or transfer sites

It should be made clear by amending policy Inf 18 that business and industry use is protected as is stated in policy Econ 4.

### **Policy INF 19- Waste Disposal Sites.**

Forth Ports Limited (0496)

Forth Ports Limited own and control land at Seafield including land identified at EW1d (safeguarded site for a combined heat and power facility). Whilst Forth Ports support the development of such a facility they do not support the land being safeguarded for such a use.

Archie Clark (0003)

It would be useful to know where waste management facilities are being planned. The plan on page 34 doesn't show anything being proposed for Torphin Quarry which would seem to be a reasonable location for certain waste types. I suggest it be considered.

### **Policy INF 20- Minerals**

Mr Rodger Thomas (0345)

On no account should the commercial extraction of peat be supported. This should be explicitly ruled out here. (3.226, p.133) Peatlands are vital carbon sinks and essential havens of biodiversity.

Archie Clark (0003)

In line with concerns expressed during COP26, a firm statement should be made within Inf 20 that extraction of coal and peat will not be permitted.

NatureScot (0528)

We consider that paragraph 3.226 should be amended to more clearly reflect the emerging national policy position in NPF4 (Policy 22: Minerals, Policy 33: Soils), ensuring that Edinburgh's City Plan 2030 plays a role in appropriately managing these resources and meeting net zero aspirations.

Juniper Green & Baberton Mains Community Council (0306)

A firm statement in section 3.226 (p133) should be made that extraction of coal and peat will not be permitted.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Policy Inf 20 should set out the factors designed to protect local communities from certain adverse aspects associated with mineral extraction. It should also outline any requirement to support the maintenance of a landbank of permitted reserves for construction aggregates of at least 10 years at all times in all market areas, and ensure restoration and aftercare requirements are outlined. The policy in the proposed plan does not reflect the current SPP requirements around paragraphs 237 and 238.

Paragraph 3.226 fails to reflect the SPP requirements around peat extraction. Paragraph 241 of SPP states 'Policies should protect areas of peatland and only permit commercial extraction in areas suffering historic, significant damage through human activity and where the conservation value is low and restoration is impossible.' SPP sets a high bar for the protection of peatland and ensures extraction is limited to only areas that have already suffered damage.

The planning authority should also consider the wording of their policy in light of draft NPF4.

SEPA (0012)

SEPA supports the provision for working quarries in the Edinburgh area on the basis that it is compatible with the aims of net zero for minerals to be won close to where they will be used.

SEPA would question the maintenance of areas for coal and peat extraction in a plan which sets out to decarbonise the economy. We consider that the rationale for further coal working must be clear and limited.

RSPB (0648)

The carbon sink value of coal should also be included here. Leaving coal in the ground protects its role as a carbon sink. The SPP also states that commercial peat extraction should only happen under very limited circumstances, therefore we suggest that wording here should be stronger.

**Policy INF 21- Telecommunications**

Juniper Green & Baberton Mains Community Council (0306)

We note the increasing number of telecoms masts, sometimes duplicating masts in close proximity (e.g. at Lanark Road near the canal). All redundant equipment should be removed. Where possible, equipment should not intrude on to footways.

Archie Clark (0003)

There are an increasing number of untidy and excessively high telecoms masts, sometimes duplicating masts in close proximity of Lanark Road. Masts that do not have adequate regard to the environment can ruin the appearance of a place. Equipment must be designed for the location and provide a unified appearance instead of the prevailing spread out miscellany of different boxes provided by different companies. All redundant equipment should be removed. Where at all possible, equipment should not intrude on to footways.

Leith Central Community Council (0614)

Telecommunication developments such as telecom masts seem exempt from public scrutiny as they are not subject to Planning applications but to Prior Approval applications. This results in free-passes for telecom operators who can install masts according to technical necessities and not being bound to a public city-wide strategy.

The lack of integration to existing buildings or existing structures is already visibly damaging Edinburgh with a growing constellation of unsightly 20m masts onto pavements. Edinburgh needs to look at other cities and their integrations of telecom antennas.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Criteria (d) should be added to the policy in respect to ensuring that telecommunications devices do not obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. This would achieve consistency with SPP and the emerging policy through draft NPF4.

### **Policy INF 22- Water Supply and Foul Waste Water.**

Crosswind Developments Ltd (0184)

CDL object to Policy Inf 22 and seek an amendment

### **Modifications sought by those submitting representations:**

#### **Resources and Services**

#### **General Energy and Waste Comments**

Frances Guy (0589)

No modification specified but it is indicated that the introduction should be coordinated with a commitment to promoting the circular economy and should allow for the provision of greater recycling, this is currently missing. The section needs to include commitments to recycling and how this will be managed.

### **Policy INF 16- Sustainable Energy and Heat Networks**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Paragraphs 2.128 and 2.129 (sustainable energy) on P33 should have a policy that states all developments in the Local Development Plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies.

It should include a specified and rising proportion of emission saved from the use of low and zero-carbon generating technologies from new development.

Reference should also be included for development proposals to take account of the City of Edinburgh Council's Local Heat and Energy Efficiency Strategy (LHEES) and Delivery Plan, when available, and also take account of Scottish Government's Heat in Buildings Strategy and the Heat Networks Delivery Plan (when formally published).

#### Crosswind Developments Ltd (0184)

The last sentence should be deleted as it is unlikely that such would be known and could be planned for. An amendment for this is set out below:

"Any developments that are not heated through heat networks must as far is possible and feasible demonstrate they are future proofed to allow future connections to heat networks to be made should capacity in a new or existing local heat network become available at a future date."

#### Leith Harbour and Newhaven Community Council (0776)

The third paragraph of the policy should be modified to state that "All new developments will be required to comply" (not should).

#### Mr Rodger Thomas (0345)

Extra emphasis should be placed on renewable heat networks as an alternative to ground and air source heat pumps in conservation areas

#### Barratt David Wilson Homes (0677)

No modification specified but it is indicated that in terms of heat networks it depends on the scale and location of development and whether it forms part of a larger scheme. No resistance to connecting to existing networks.

#### Stirling Developments Limited (0303)

No modification specified but it is indicated that policies should not place undue burden on development sites such that they become unviable. Policies must align with wider plan to ensure deliverability and flexibility.

#### Homes for Scotland (0404)

No modification specified but it is indicated that in terms of heat networks it depends on the scale and location of development and whether it forms part of a larger scheme. No resistance to connecting to existing networks. However, it should not be an obligation on the home building industry to provide new facilities and networks.

Steve Loomes (0767)

No modification specified but it is indicated that in terms of heat networks it depends on the scale and location of development and whether it forms part of a larger scheme. No resistance to connecting to existing networks. However, it should not be an obligation on the home building industry to provide new facilities and networks.

Leith Central Community Council (0614)

No modifications specified but it is indicated that all new developments like wind turbines should have conditions attached to them for their recycling/dismantling once they reach their shelf life and do not operate anymore.

Hallam Land Management (0615)

Clear reference to or identification of the existing heat network map needs to be made. Better clarification on what would constitute a 'viability and feasibility' study is required, and at what stage of planning. 'Substantial' development should be defined more clearly.

Morag MacLean (0326)

No modification specified but it is indicated that there needs to be more detail and planning for community heating. Community heating works in loads of European countries, why not here?. It would be more eco friendly to have one big boiler for lots of people rather than hundreds of individual boilers.

Cockburn Association (0777)

No modification specified but it is indicated that it is essential if we are to meet the net-zero Caron Strategy by 2030 that we move beyond a simple operational carbon/energy perspective of development and shift to a total carbon/energy assessment, taking into account life cycle costing and embodied energy in materials. New building including mass housing should include renewable generation technologies within the fabric, evidenced at the point of consent. Thus, the additional policies should be added on the sustainability of building materials and building technologies as well as a policy on renewable energy generation in all new developments.

Edinburgh World Heritage (0339)

Change bullet point wording as follows:  
"do not cause notable harm...."

Amend point a as follows:

"...including natural heritage interest and the setting, character and appearance of the World Heritage Sites (Including buildings, public realm, gardens, green spaces and views which contribute to Outstanding Universal Value), listed buildings..."



Add to paragraph 3.217 as follows:

“...will accord with policy Inf 16, policy Env 18 and Env 9”

### **Policy INF 17- Safeguarding of Existing Waste Management Facilities.**

Crosswind Developments Ltd (0184)

Safeguarding of existing waste management facilities should not be identified on the proposals map for the crosswind site.

Alasdair Gillies (0035)

No modification specified but is indicated that Braehead Quarry Civic Amenity site should be removed from 2.133. The policies regarding waste need to be bolder.

### **Policy INF 18- Provision of New Waste Management Services**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

A policy statement should be added to Page 33 – Waste to meet the requirements of SPP para 180, to encourage opportunities for reuse, refurbishment, remanufacturing and reprocessing of high value materials and products, in line with the waste hierarchy.

Gordon Drummond (0382)

Page 8, section 2.2. states:

"Adopting an 'infrastructure first' approach, directing new development to where there is existing infrastructure. Where required to support new development, the Plan requires new and expanded community infrastructure including schools, healthcare, sustainable transport, energy and waste to support our spatial strategy."

There is no mention of waste management in any other part of this document. Thus the logical change would be to remove this spurious claim.

Forth Ports Limited (0496)

Amend paragraph 2.136 (p33) as follows:

Accordingly, this plan supports existing and new waste management facilities at operational quarries and safeguarded sites. Seafeld Industrial Estate (EW1d) has potential to accommodate the development of a new waste management facility but is not safeguarded for such use.

Amend map 9 on (p34) to remove identification of the site.

Delete" point c. on (p49) "the Seafeld Industrial Estate (EW 1d) is the subject of a waste management / combined heat and power safeguard"

Delete the second sentence of paragraph 3.215, (p130) which reads "Keeping a reduced general freight rail head to the east in Seafeld will complement the safeguard for a waste

management facility in that location (see Policy Inf 18).”

Delete the following on (P 132) “Seafeld Industrial Estate is designated EW 1d on the Proposals Map for a waste management facility incorporating thermal treatment with energy recovery. Other development proposals at Seafeld will only be permitted if they do not adversely affect this waste management option.”

Portobello Amenity Society (0612)

Under the heading Inf 18 (p132) sections and b) 'business and industry' and c) 'other suitable sites' should be dropped as the statement that planning permission 'will be granted' would allow development for waste facilities on residential urban sites to the detriment of existing communities.

Diana Cairns (0452)

No modifications specified but it is indicated that the proposals map should be updated to show that the freightliner terminal site is also covered by policy Inf 18 as well as Econ 4.

Network Rail (0071)

It should be made clear where within the Seafeld Industrial Estate (EW1d) allocation, the waste management / combined heat and power safeguard is to be located.

Stephen Ian Hawkins (0469)

Sections b) and c) of Inf 18 should be deleted.

**Policy INF 19- Waste Disposal Sites.**

Forth Ports Limited (0496)

Amend paragraph 3.233 (Sic- 3.222) as follows:

Land at Seafeld Ind (identified as EW 1d) has locational advantages: it is sufficiently remote from housing areas; it has the benefit of rail access; and it has an outlet in nearby regeneration and potentially industrial uses for energy recovered after thermal treatment. Accordingly, it's potential as a location for energy from waste and combined heat and power uses is recognised.

Archie Clark (0003)

No modification specified but it is indicated that it would be useful to know where waste management facilities are being planned. Torphin Quarry which would seem to be a reasonable location for certain waste types.

**Policy INF 20- Minerals**

Mr Rodger Thomas (0345)

No modifications specified but it is indicated that paragraph 3.226, (p133) should make it clear that on no account should the commercial extraction of peat be supported.

Archie Clark (0003)

No modifications specified but it is indicated that a firm statement should be made within Inf 20 that extraction of coal and peat will not be permitted.

NatureScot (0528)

We suggest that paragraph 3.226 (page 133) should be amended to: "Proposals for the extraction of coal will not be supported other than in exceptional circumstances. Proposals for the extraction of peat will generally not be supported unless it can be demonstrated that they: Support an industry of national importance to Scotland; and There is no reasonable substitute; and Extraction is minimised and a residual depth of peat of no less than 1 metre is retained; and The time period for extraction is the minimum necessary, and the application is supported by a comprehensive restoration plan which will return the area of extraction to its original environmental status.

In both cases, applications for extraction of peat or coal will be assessed for environmental and traffic impacts using other policies in this Plan."

Juniper Green & Baberton Mains Community Council (0306)

No modifications specified but it is indicated that a firm statement should be made within Inf 20 that extraction of coal and peat will not be permitted.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Policy Inf 20 should be amended to reflect the requirements of para 241 of SPP in relation to peat extraction.

It is also indicated that the policy Inf 20 should be amended to reflect the current SPP requirements around paragraphs 237 and 238

SEPA (0012)

No modifications specified but it is indicated that the policy could make a link or requirement that minerals worked in Edinburgh to be used in Edinburgh. The rationale for further coal working must be clear and limited.

The policy relating to peat could be turned round to ensure that maintenance, restoration and 'growth' of peat as part of an application is an added benefit to be accrued from that development.

RSPB (0648)

Suggested changes to text in paragraph 3.226: "The Plan area also includes deposits of coal in the west and southeast and small areas of peat in the southwest. Proposals for their extraction will be assessed for their environmental and traffic impact using other policies in this Plan. An additional consideration, when assessing proposals affecting coal and peat, is their value as a carbon sink."

## **Policy INF 21- Telecommunications**

### Juniper Green & Baberton Mains Community Council (0306)

No modifications specified but it is indicated that the policy should state that all redundant equipment should be removed and where possible, equipment should not intrude on to footways.

### Archie Clark (0003)

The policy should make reference that all redundant equipment should be removed and where possible, equipment should not intrude into footways and be designed to have a unifying appearance. Reference should be made to 'PAN 62 Radio Telecommunications' and CEC's own 'Communications Infrastructure 2018'.

### Leith Central Community Council (0614)

No modifications specified but it is indicated that the policy needs to rebalance the need to protect the city and the need for telecom masts.

### Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Add the following criteria d. as follows:

'Telecommunications development will be supported provided:

- a. the visual impact of the proposed development has been minimised through careful siting, design and, where appropriate, landscaping,
- b. it has been demonstrated that all practicable options and alternative sites have been considered, including the possibility of using existing masts, structures and buildings and/or site sharing and
- c. the proposal would not harm the built or natural heritage of the city;
- d. there is no physical obstruction to aerodrome operations, technical sites or existing transmitter/receiver facilities.

## **Policy INF 22- Water Supply and Foul Waste Water.**

### Crosswind Developments Ltd (0184)

Seek an amendment to the wording of the policy as set out below:

"Planning permission will be supported where there is adequate water supply and foul waste water sewerage capacity available to meet the demands of the development and where necessary improvements can be provided to enable this".

## **Summary of responses (including reasons) by planning authority:**

### **General Energy and Waste Comments**

### Frances Guy (0589)

Page 33 of the plan has a section on waste. Paragraph 2.130 of the plan makes reference to Scotland's national waste strategy, the Zero Waste Plan (CD115) which is based on a waste hierarchy. It states that this means that waste should be prevented, reused, recycled or recovered and that landfilling of waste is the last resort. Paragraph 2.131 states that the waste hierarchy is being implemented through the Waste (Scotland) Regulations 2012 (CD125). These will lead to a significant increase in the number and range of waste management facilities needed in order to collect, sort and treat all waste which would have otherwise gone to landfill. Paragraph 2.134 states that the food processing and energy recovery facility at Millerhill has been provided by Midlothian and City of Edinburgh Council and deals mainly with household waste. Two enhanced waste transfer stations have been developed at Bankhead and Seafield. The provision of household waste recycling centres will be kept under review as the City grows. **No modification proposed.**

### **Policy INF 16- Sustainable Energy and Heat Networks**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Policies Env 7 (Sustainable Developments) and Env 8 (New Sustainable Buildings) address sustainable design. The Council's response to representations on these matters are addressed in Issue 13 (Sustainable Design). The Council's approach has been cognisant of the information set out in the Scottish Government's publication titled 'Research Project: Development a Scotland Wide Section 3F Planning Policy' (CD171). **No modification proposed**

The Council is of the view that the policy is robust. No modifications proposed, however, should the reporter be so minded reference could be included in Policy Inf 16 for development proposals to take account of the City of Edinburgh Council's Local Heat and Energy Efficiency Strategy (LHEES) and Delivery Plan, when available, and also take account of Scottish Government's Heat in Buildings Strategy and the Heat Networks Delivery Plan (when formally published) for clarity.

Crosswind Developments Ltd (0184)

The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that development will deliver the strategy. **No modification proposed.**

Leith Harbour and Newhaven Community Council (0776)

The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Mr Rodger Thomas (0345)

The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development,

whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Barratt David Wilson Homes (0677)

The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Stirling Developments Limited (0303)

The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Homes for Scotland (0404) Steve Loomes (0767)

In line with SEPA planning background paper, (heat networks and district heating) (CD128), Policy Inf 16 states that all new developments, should connect to an existing or planned heat network or other significant heat source, wherever possible to do so. Where this is not possible then all, substantial\* ( \*'Substantial' developments may consist of new towns, urban extensions, large regeneration areas or large development sites subject to master planning) development must, subject to a viability and feasibility study, instead include a source of renewable/low carbon heat generation (and avoids any negative impact on air quality) and associated heat network within the development. Developments which are smaller than this substantial threshold are still encouraged to provide heat generation where they cannot connect to the existing network, however this is only supported where such heat generation would be from a renewable/low carbon source. The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Leith Central Community Council (0614)

The Council considers that the wording of policy Inf 16 is robust and it will enable the aims of the strategy to be delivered. **No modification proposed.**

Hallam Land Management (0615)

In line with SEPA planning background paper, (heat networks and district heating) (CD128), the policy states that all new developments, should, connect to an existing or planned heat network or other significant heat source, wherever possible to do so. Where this is not possible then all, substantial\* ( \*'Substantial' developments may consist of new towns, urban extensions, large regeneration areas or large development sites subject to master planning) development must, subject to a viability and feasibility study, instead include a source of renewable/low carbon heat generation (and avoids any negative impact on air quality) and associated heat network within the development.

Developments which are smaller than this substantial threshold are still encouraged to provide heat generation where they cannot connect to the existing network, however this is only supported where such heat generation would be from a renewable/low carbon source. The Council considers the wording of Policy Inf 16 is suitably robust so that it shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. The council agrees that guidance is an important part of providing further information to assist with the interpretation and implementation of this policy. In this regard paragraph 3.219 notes that guidance will be updated to this affect. **No modification proposed.**

Morag MacLean (0326)

Policy Inf 16 states that all new developments should connect to an existing or planned heat network or other significant heat source wherever possible to do so. Any developments that are not heated through heat networks must demonstrate they are future proofed to allow future connections to heat networks to be made and all buildings to be readily able to be connected to a heat network when one becomes available. The Council considers the wording of policy Inf 16 to be robust and it will ensure that the aims of the strategy are delivered. **No modification proposed.**

Cockburn Association (0777)

Policy Inf 16 states that all new developments should connect to an existing or planned heat network or other significant heat source wherever possible to do so. Where this is not possible then all substantial\* development must, subject to a viability and feasibility study, instead include a source of renewable/low carbon heat generation (and avoids any negative impact on air quality) and associated heat network within the development. The Council's position relative to new sustainable buildings is covered in detail in Issue 13: Sustainable Design. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council considers the wording of Policy Inf 16 to be suitably robust. It shall provide certainty in the requirements needed to be made by different scales of development, whilst still providing the required degree of flexibility where appropriate. Policy Inf 16 will ensure that the aims of the strategy will be delivered. Policy Env 9 (World Heritage Sites) would also be applicable in the assessment of any application that could harm the qualities of World Heritage Sites. The Council's position relative to the historic environment is covered in detail in Issue 14: Historic Environment Policies. **No modification proposed.**

Grange/Prestonfield Community Council (0192), Philip Endecott(0079), SEPA(0012),  
Juniper Green & Baberton Mains Community Council(0306), Archie Clark(0003),  
Councillor Neil Ross(0610), RSPB(0648)

Support noted.

**Policy INF 17- Safeguarding of Existing Waste Management Facilities.**

Crosswind Developments Ltd (0184)

Safeguarding of existing waste management facilities is not identified on the proposals map for the Crosswind site. **No modification proposed.**

Alasdair Gillies (0035)

The Council considers the wording of policy Inf 17 to be robust and it will ensure that the aims of the strategy will be delivered. Braehead Quarry Civic Amenity Site is currently not utilised as a recycling centre, however, it is still used by City of Edinburgh Council Waste Services and Roads department. The adjacent site is also a waste management site, operated privately. **No modification proposed.**

Grange/Prestonfield Community Council(0192), SEPA (0012), Stephen Ian Hawkins (0469)

Support noted.

### **Policy INF 18- Provision of New Waste Management Services**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Paragraph 2.130 of the plan makes reference to Scotland's national waste strategy, the Zero Waste Plan which is based on a waste hierarchy. It states that this means that waste should be prevented, reused, recycled or recovered and that landfilling of waste is the last resort. **No modification proposed.**

Gordon Drummond (0382)

Page 33 of the plan has a section on waste. Paragraph 2.130 of the plan makes reference to Scotland's national waste strategy, the Zero Waste Plan (CD115) which is based on a waste hierarchy. It states that this means that waste should be prevented, reused, recycled or recovered and that landfilling of waste is the last resort. Paragraph 2.131 states that the waste hierarchy is being implemented through the Waste (Scotland) Regulations 2012 (CD125). These will lead to a significant increase in the number and range of waste management facilities needed in order to collect, sort and treat all waste which would have otherwise gone to landfill. Paragraph 2.134 states that the food processing and energy recovery facility at Millerhill has been provided by Midlothian and City of Edinburgh Council and deals mainly with household waste. Two enhanced waste transfer stations have been developed at Bankhead and Seafield. The provision of household waste recycling centres will be kept under review as the City grows. **No modification proposed.**

Forth Ports Limited (0496)

Land at Seafield Industrial Estate identified as EW1d in the proposed plan is already identified in the adopted LDP (CD039) as a safeguarded site for a waste management facility incorporating thermal treatment with energy recovery. This site has already been through an examination process. Paragraph 3.222 explains why the site should remain safeguarded. It identifies that the site has unique location advantages: It is sufficiently remote from housing areas; it has the benefit of rail access; and it has an outlet in nearby



regeneration and potentially industrial uses for energy recovered after thermal treatment. Accordingly, its potential as a location for energy from waste and combined heat and power uses should be retained in any development proposals. **No modification proposed.**

Portobello Amenity Society (0612)

The wording of criterion (b) and (c) of policy Inf 18 is the same as that in policy Rs3 (Provision of New Waste Management Facilities) in the adopted LDP which went through an examination process (CD039). Any planning application for the construction of a waste facility, regardless of where it was proposed, would have to provide a high level of information to prove to the satisfaction of the Council that it would not materially impact residential amenity or the environment. The Council considers the wording of policy Inf 18 to be robust. **No modification proposed.**

Diana Cairns (0452)

The wording of criterion (b) of policy Inf 18 is the same as that in policy Rs3 (Provision of New Waste Management Facilities) in the adopted LDP which went through an examination process. The Business and Industry areas identified under the proposed plan were also designated as such in the current LDP (CD039). The site on Harry Lauder Road is correctly identified as a Business and Industry area in the proposals map. The interactive proposed city plan map does highlight that policy Inf 18 is a relevant policy in the consideration of development on that site. Any planning application for the construction of a waste facility, regardless of where it was proposed, would have to provide a high level of information to prove to the satisfaction of the Council that it would not materially impact residential amenity or the environment. The Council considers the wording of policy Inf 18 to be robust. **No modification proposed.**

Network Rail (0071)

Seafield Industrial Estate is designated EW 1d on the proposals map for a waste management facility incorporating thermal treatment with energy recovery. However, is only identified as a safeguard, as it is in the current LDP (CD039). The location of the facility would be determined at the planning application stage. Network Rail would be consulted as part of any planning application for the construction of the facility and the assessment of the application would look at all material planning considerations. **No modification proposed.**

Stephen Ian Hawkins (0469)

The wording of criterion (b) of policy Inf 18 is the same as that in policy Rs3 (Provision of New Waste Management Facilities) in the adopted LDP which went through an examination process. The Business and Industry areas identified under the proposed plan were also designated as such in the current LDP (CD039). The site on Harry Lauder Road is correctly identified as a Business and Industry area in the proposals map. The interactive proposed city plan map does highlight that policy Inf 18 is a relevant policy in the consideration of development on that site. Any planning application for the construction of a waste facility, regardless of where it was proposed, would have to provide a high level of information to prove to the satisfaction of the Council that it would

not materially impact residential amenity or the environment. The Council considers the wording of policy Inf 18 to be robust. **No modification proposed.**

Grange/Prestonfield Community Council(0192), SEPA(0012)  
Support noted.

### **Policy INF 19- Waste Disposal Sites.**

Forth Ports Limited (0496)

Land at Seafield Industrial Estate identified as EW1d in the proposed plan is already identified in the adopted LDP (CD039) as a safeguarded site for a waste management facility incorporating thermal treatment with energy recovery. This site has already been through an examination process. Paragraph 3.222 explains why the site should remain safeguarded. It identifies that the site has unique locational advantages. Accordingly, its potential as a location for energy from waste and combined heat and power uses should be retained in any development proposals. **No modification proposed.**

Archie Clark (0003)

The proposals maps and map 9 in the plan clearly indicate where there are safeguarded waste management facilities. Paragraph 2.134 states that the provision of household waste recycling centres will be kept under review as the City grows. **No modification proposed.**

Grange/Prestonfield Community Council(0192), SEPA(0012)

Support noted.

### **Policy INF 20- Minerals**

Mr Rodger Thomas (0345), Archie Clark (0003), NatureScot (0528), Juniper Green & Baberton Mains Community Council (0306), RSPB (0648), SEPA (0012)

Paragraph 3.266 of the plan states that proposals for the extraction of coal and peat will be assessed for their environmental and traffic impact using other policies in the plan. The plan includes a variety of environment policies, like Env 21 (Protection of Biodiversity) which states that all proposals should safeguard habitat features of biodiversity value and priority species. Policy Env 37 (Designing-in Positive effects for Biodiversity) states that so far as applicable to the scale and nature of the development, proposals must have a positive effect on biodiversity by ensuring proposals follow a sequence of specified principles which provide a mitigation hierarchy. Policy Env 37 also states that consideration of biodiversity should include, but is not limited to, soils, habitat networks and environmental quality within and linking to a site. Paragraph 3.226 also states that an additional consideration, when assessing proposals affecting peat, is its role as a carbon sink.

The Council is of the view that the wording of policy Inf 20 is adequately robust and balances the importance of protecting viable mineral deposits whilst ensuring that the potential environmental impact and role of peat as a carbon sink is considered.

**No modification proposed**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The current SPP (CD096) was published in 2014. Policy Inf 20 has the same wording as Policy Rs5 (Minerals) in the adopted LDP (CD039), which has gone through an examination process and was adopted in November 2016 after the SPP was published. The plan continues to safeguard the 4 quarries identified, Hillwood, Bonnington Mains, Ravelrig and Craigiehill Quarry and 3 out of the 4 are operational. Supporting paragraph 3.225 notes that the only mineral resource within the area likely to be economically viable in the plan period is hard rock.

Paragraph 3.266 of the plan states that proposals for the extraction of coal and peat will be assessed for their environmental and traffic impact using other policies in the plan. The plan includes a variety of environment policies, like Env 21 (Protection of Biodiversity) which states that all proposals should safeguard habitat features of biodiversity value and priority species. Policy Env 37 (Designing-in Positive effects for Biodiversity states that so far as applicable to the scale and nature of the development, proposals must have a positive effect on biodiversity by ensuring proposals follow a sequence of specified principles which provide a mitigation hierarchy. Policy Env 37 also states that consideration of biodiversity should include, but is not limited to, soils, habitat networks and environmental quality within and linking to a site. Paragraph 3.226 also states that an additional consideration, when assessing proposals affecting peat, is its role as a carbon sink.

The Council is of the view that the wording of policy Inf 20 is adequately robust and balances the importance of protecting viable mineral deposits whilst ensuring that the potential environmental impact and role of peat as a carbon sink is considered.

**No modification proposed**

Tarmac(0244), Grange/Prestonfield Community Council(0192)

Support noted.

**Policy INF 21- Telecommunications**

Juniper Green & Baberton Mains Community Council (0306)

The Council considers the wording of policy Inf 21 to be robust and will ensure that the strategy will be delivered. Paragraph 3.228 states that conditions will be imposed on any consent, requiring the removal of any mast or apparatus and the reinstatement of a site to its former condition when it becomes redundant. **No modification proposed.**

Archie Clark (0003)

The Council considers the wording of policy Inf 21 to be robust and will ensure that the aims of the strategy will be delivered. Paragraph 3.228 states that conditions will be imposed on any consent, requiring the removal of any mast or apparatus and the reinstatement of a site to its former condition when it becomes redundant. **No modification proposed,**

Leith Central Community Council (0614)

The Council considers the wording of policy Inf 21 to be robust and will ensure that any proposal will not harm the built or natural heritage of the city. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The Council considers the wording of policy Inf 21 to be adequately robust and that aerodrome operators would be a consultee during the assessment of a planning application of this type. **No modification proposed**

Grange/Prestonfield Community Council(0192)

Support noted.

**Policy INF 22- Water Supply and Foul Waste Water.**

Crosswind Developments Ltd (0184)

The wording of policy Inf 22 is very similar to the wording of policy Rs 6 (Water and Drainage) in the adopted LDP (CD039) which has been subject to examination. The Council considers the wording of policy Inf 22 to be robust and will ensure that the aims of the strategy will be delivered. **No modification proposed.**

Grange/Prestonfield Community Council (0192), Scottish Water (0342), SEPA (0012)

Support noted.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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Issue 35	Economy Policies	
Development plan reference:	Policies Econ 1-7	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Abrdn (0425) Archie Clark (0003) Aviva Life and Pensions UK Limited (0598) Barratt David Wilson Homes (0677) Homes for Scotland (0404) Brain Tiplady (0641) Cinnamon Sedge Ltd (0594) Cockburn Association (0777) Cramond &amp; Barnton Community Council (0243) Crosswind Developments Ltd (0184) Defence Infrastructure Organisation (0124) Diana Cairns (0452) Edinburgh BioQuarter Partners (0478) Edinburgh Napier University (0731) Edinburgh World Heritage (0339) Elgin Haymarket Limited (0292) Forth Ports Limited (0496) Gibson Fitness Ltd (0122) Hallam Land Management (0615) Homes for Scotland (0404) Juniper Green &amp; Baberton Mains Community Council (0306) Leith Central Community Council (0614) Living Streets Edinburgh Group (0486)</div><div>Lord Dalmeny (0475) Lorraine Smith (0462) LPBZ Commercial Ltd (0391) Lynn Grattage (0362) Melford Developments Ltd (0308) Mr T Klan (0307) National Galleries of Scotland (0725) NHS Lothian (0596) Royal Highland &amp; Agricultural Society of Scotland (0482) Royal Mail Group Limited (0501) Ryden LLP (0578) Scottish Property Federation (0144) SEPA (0012) Shelborn Edinburgh Limited (0732) Steve Loomes (0767) Tarmac (0244) The Institute of Chartered Accountants of Scotland (0182) The Royal London Mutual Insurance Society Ltd (0149) University of Edinburgh (0464) VisitScotland (0689)</div></div></div>		
Provision of the development plan to which the issue relates:	These policies set out the development plan requirements in order to deliver the Plan's economy strategy.	
Planning authority's summary of the representation(s):		
<div>Policy Econ 1 Supporting Inclusive Growth, Innovation and culture</div> <div>SEPA (0012)</div> <div>Focusing on long term adaptative planning may need a statement that acknowledges that short term gain from development and GDP, as an economic measure, may not be compatible with a sustainable future. Bolstering of the 'nature-based solutions (NBS)' market will be key to the future regeneration required to respond to the climate and biodiversity crisis. Innovative blue-green infrastructure has a fundamental role to play in ensuring wider social/economic and environmental multi-benefits are maximised in future</div>		

fitting design for place.

Cockburn Association (0777)

Support subject to inclusion of a reference to lifelong learning.

Crosswinds Developments Ltd (0184)

Support policy but amend to cover the proposed offering available in Edinburgh. Site H61 Crosswind will be site for innovation and plan should aim to accommodate commercial development, including tech industries such as is proposed for the Crosswinds Site.

Edinburgh Napier University (0731)

Support the policy and encourage the Council to keep the policy as flexible as possible to ensure the University can continue to meet its development requirements in the future. Suggest adding a reference to collaboration and the need for a partnership approach to the policy to ensure the usage of developments delivered across the city and that positive impacts on communities are maximised.

Identify further and higher education institutions on the Proposals Map if they are supported by Econ 1.

Leith Central Community Council (0614)

The policy should also explicitly mention the need to safeguard existing social enterprises, business start-ups, university linked education, research and innovation, and culture rather than seeing them being demolished as is currently the case in Leith.

National Galleries of Scotland (0725)

Support the policy but in recognition of the contribution that the national cultural institutions based in Edinburgh make towards the city's economy and culture, should amend policy to add additional cultural criteria.

NHS Lothian (0596)

Support the policy but in recognition of the NHS Lothian's commitment to improving the health and wellbeing of the population welcome the introduction to a specific reference to health and care system.

University of Edinburgh (0464)

Welcome reference to supporting University linked education, research and innovation, but benefits should not be underestimated and further support for growth and continuation of activity should be explicitly stated in the policy. Disappointed there is not a focus or encouragement for university and higher education activity or statement of the contribution it makes to innovation in Edinburgh in the plan. Edinburgh is a pre-eminent location for innovation, learning and skills and the activity of the Universities should be given appropriate recognition and weight in the planning process to support further investment enhancement and development of facilities, and recognition of the proximity and

development benefits from these institutions. Only reference to university activity is in Policy Econ 1.

The University makes a significant contribution to GVA in the UK and in Edinburgh and therefore references in policy should be expanded to actively encourage proposals related to this sector and support enhancement and development of University and innovation facilities. Also need to support proposals contained within the University estates strategies with a focus on specific opportunities for enhancement and development of facilities. Should be scope in the plan to provide policy support for established initiatives and areas of concentration of university related activity, including areas such as Edinburgh Bioquarter, Lauriston Innovation district and Kings Buildings.

The Lauriston Innovation District is referenced in the Council's City Centre Transformation Plan and is a key focus for university activity and further investment to drive innovation in the city. This focus of activity should be afforded appropriate recognition in the plan, either through a specific Place policy or definition as an area of economic importance (as is the case with both designations at BioQuarter).

King's Buildings is also a core focus for academic, research and innovation activity, and is home to a number of high profile research facilities as well as University commercialisation and collaboration ventures. The site is currently zoned as being within the 'urban area' with no specific recognition of the role, function or importance of this location to the city and knowledge economy. These areas are separate and distinct from the general use areas of the city and provide scope to maximise the benefits from university activity, and accordingly should be afforded appropriate recognition and designations in the plan. Other cities with similar leading academic institutions driving innovation ecosystems, have placed a specific focus on innovation and research. All have appropriate recognition and specific policy support to encourage activity in these areas, and the University advocates for this approach to be replicated in the City Plan.

The University of Edinburgh have a substantial estate located across Edinburgh. The University activity is closely intertwined across the city and will continue to evolve and develop in response to operational needs. The University of Edinburgh's estate provides a number of key functions in the city, from innovation, teaching and education, to accommodation and sporting facilities. It is submitted that the City Plan 2030 should recognise the importance of the University of Edinburgh's facilities and how these can benefit the city as a whole.

All of these contribute towards their immediate local area and help to sustain the Council's desired 20 minute neighbourhood concept, active travel routes and sustainable developments. The mix of uses within each location is important to the University of Edinburgh in order to provide facilities that provide for more than just education and learning.

It is noted that Heriot Watt benefits from a campus location protection. The current Edinburgh Local Development Plan 2016 states in Policy EMP3 (Riccarton University Campus and Business Park), that development specifically allows for 'uses ancillary to the University, including student accommodation'.

This policy is proposed to be continued within the Edinburgh City Plan 2030 under Place 21: Riccarton University Campus and Business Park.

It is submitted that the University of Edinburgh should also benefit from an appropriate level of encouragement and protection, whereby university facilities and ancillary uses can be developed and / or enhanced alongside each other. It is submitted that the University of Edinburgh should also be considered for similar Place designations at its key locations, or at least be given a similar level of support through policy.

In addition, it is submitted that there should be scope within the determination of planning application to consider whether an inappropriate or unacceptable concentration of a land uses would be detrimental to University operations and could negatively impact on University activities.

The introduction of a specific policy to promote and protect University activity is recommended, to allow appropriate weight to be attributed to University driven activity in the planning process, and to allow protection of existing University facilities where inappropriate uses, or concentration of uses are proposed in close proximity. This approach does not need to be specific to University of Edinburgh and could equally apply to other University facilities across the city and would accord with the approach as advocated in Place 21: Riccarton.

The approach should recognise that University activity is not defined to specific campus locations, and more should reflect the wider presence of University facilities and activity across the city – in key and strategic locations as well as being intertwined in the fabric of the city. The inclusion of policy support to ensure an appropriate level of promotion and protection of University activity will ensure that the key role that Universities play in the context of the city life and economy can continue to flourish and grow, and further support the success of the city as a whole.

#### Edinburgh World Heritage (0339)

Modify Policy and supporting text to appropriately reflect and support the economic and cultural contribution of Edinburgh's heritage.

#### Representations supporting the policy

Grange/Prestonfield Community Council (0192), Jupiter Artland (0257), Liberton & District Community Council (0084).

### **Policy Econ 3 Office Development**

#### Aviva Life and Pensions UK Limited (0598)

The Edinburgh office vacancy rate is one of the lowest in the UK regional market and this is expected to fall lower. With no continued, Grade A space, Edinburgh will not be able to attract inward investment and will be unable to accommodate existing occupiers looking to remain and/or expand. Aviva would therefore encourage the Council to further consider the future of the Haymarket area as a key city centre destination, and would welcome reference to the area as suitable place for the provision of high quality, high density office accommodation.



There is opportunity for the CEC to make reference within the Policy to sustainability standards and the need to ensure that the requirements of modern occupiers are considered from the outset of development projects, who are now, more than ever, concerned about the quality of buildings. Should a building perform poorly on one, or several, of these standards, a building will not be considered suitable by occupiers, which can then lead to said buildings become unlettable. Although these standards will continue to evolve and change over time, businesses that occupy offices require the best space to attract the best staff. These matters could be referred to, or explored further by the Council within the context of the Policy to ensure a consistent quality of office accommodation is delivered across the city.

Crosswind Developments Ltd (0184)

Object to Policy Econ 3 on the grounds that Crosswind (Site H61) is not identified on the proposals map as a strategic business centre. The policy wording of Econ 3 would preclude office development on this site as currently worded. CDL seek clarification on point b of policy Econ 3 Office Development which references three strategic business centres at Edinburgh Park/ South Gyle, West Edinburgh and Leith. CDL require site H61 to be included as part of the West Edinburgh Strategic Business Centre and the Proposals Map to be updated accordingly. Failure to make these amendments will seriously impact on the ability of site H61 to develop out as a mixed-use site and a 20 minute neighbourhood.

Elgin Haymarket Limited (0292)

Support policy but the term '20-minute city hubs' should be added to this policy to help further support higher density office led mixed use development in the city centre close to active and public transport.

Hallam Land Management (0615)

Refine clause e(i) and (ii) of policy. Site proposed by respondent at Craigiehall contains existing office developments previously used by the MoD which would potentially be suitable for Class 4 Uses. As currently drafted Policy Econ 3 would effectively preclude re-use of the site for this purpose unless a Local Centre was permitted as part of the mixed-use development. The potential for office development is being squeezed in West Edinburgh as a result of Proposed Plan policy Econ 2 and housing policy which is converting swathes of available sites in West Edinburgh to housing. The implication is a reduction of employment activity in the A8 corridor.

Juniper Green & Baberton Mains Community Council (0306)

Section 3.235 refers to, "continuing demand for office space in the city centre". However, we question whether this is a current assessment of the present situation. Further, even if it is a current assessment, we suggest further office development in the city centre should not be encouraged, but instead should be encouraged elsewhere to support and be consistent with the 20-minute neighbourhood.

Leith Central Community Council (0614)

Office development should come with a range of mixed-use units and a variety of smaller units at street level.

Living Streets Edinburgh Group (0486)

Support in principle including the intention to locate such development where accessible by public transport and walking/cycling, but to ensure that this is taken seriously the Council must also revise the policy to require that there is no car parking provision to be made other than for disabled and essential servicing.

LPBZ Commercial Ltd (0391)

Remove “preferably as part of business led mixed use proposals” from the policy wording under ECON3 which relates to new office developments within strategic business centres. If a site is allocated as a strategic business centre, LPBZ believe that business/office uses should be the only permitted uses, otherwise even more business land in Edinburgh will be lost.

LPBZ urges the City of Edinburgh Council to review the wording of this policy to ensure that small scale office proposals, particularly where they facilitate the expansion of an existing nearby business and are located in sustainable locations, do not need to carry out a sequential test or impact assessment.

Policy requirements mean that any future additional office development at the former casino site will need to demonstrate that designated office locations are unsuitable or unavailable, demonstrate access to public transport nodes and include an assessment of impact on existing town centres. This seems extremely excessive for a relatively small-scale office proposal seeking to provide additional space for a valuable and expanding business in Edinburgh.

Melford Developments Ltd (0308)

There is a threshold of 2500 sqm which does not seem to be reasonable in a city centre location.

Archie Clark (0003)

Para. 3.235 on page 135, (209-page version) refers to “continuing demand for office space in the city centre”. However, one must question whether this assessment is still valid. Even if it were a current assessment, should further office development in the city centre be encouraged, or should office development instead be distributed elsewhere to support and be consistent with the 20-minute neighbourhood policy?

Scottish Property Federation (0144)

Support the policy, but would caution against rigid planning requirements for offices to be added to developments led by other uses, that may struggle to secure office occupation for their location.

Shelborn Edinburgh Limited (0732)

The needs of modern office occupiers is changing and post-Covid it is expected that users will be focused on sustainability and staff wellbeing. Shelborn would suggest that there is opportunity for the Council to make reference to both of these matters within the scope of Policy Econ 3, to ensure a consistently high quality office offering is delivered across the city.

#### The Institute of Chartered Accountants of Scotland (0182)

ICAS agree that the city centre is the prime, and most desirable location, for office occupiers in the city centre. Given its proximity to Haymarket Train Station, the Haymarket tram halt and a range of bus services, the Haymarket Yards area is a unique, highly accessible and substantial, redevelopment opportunity within the boundary of the city centre that has the potential to provide the extent of high quality office accommodation that Edinburgh requires, as well as a range of supporting uses, amenities and infrastructure. Therefore, ICAS encourage the Council to further consider the future of Haymarket Yards as a key city centre destination, and would welcome reference to Haymarket Yards within the Proposed Plan.

Given that CA House is an active Class 4 Business premises within the city centre, ICAS would request that the Proposed Plan protects existing business uses, such as CA House, and recognises that any future alternative development proposals must not prejudice the ongoing operation of existing operations within the city centre. It is submitted that the policy approach in this regard should be to support existing established uses and that consideration should also be given to ensuring that any alternative uses introduced to the city centre are compatible with the uses and existing operations present in the area, whilst acknowledging the opportunity that wider redevelopment may bring.

#### Edinburgh World Heritage (0339)

Modify policy to ensure appropriate conservation of the historic environment.

### **Policy Econ 4 Business and Industry Areas**

#### Brain Tiplady (0641)

The section should address travel, particularly public transport. New development should only be permitted where there is good public transport access - and not just access from the city centre, which meets the needs of relatively few people. There should be active policies for identifying employment centres with poor public transport access, and improving it, or promoting shifts of employment to better serviced centres as many of the existing business and industry areas are very poorly served by public transport.

#### Diana Cairns (0452)

Do not support Econ 4 with reference to the former freightliner terminal at Sir Harry Lauder Road, Portobello. The wording of the policy seems to be deliberately vague and general, which means it can potentially allow a wide range of developments on these types of site. Therefore, a comprehensive list of types of development that would and would not be allowed on such sites should be included. It was only by looking at policy Inf 18 that I discovered that a site such as the former freightliner terminal, that is designated as being for business and industry uses, could also be considered for a waste facility. An

application for a massive waste transfer station by Viridor was rejected by Scottish government Reporters in 2010 on the grounds of the detrimental impact on residential amenity and the Portobello conservation area. Any such development would be unwelcome on this site and should not be considered.

#### Cinnamon Sedge Ltd (0594)

Royal Elizabeth Yard (REY) site should be removed from the green belt on the proposals map and allocated as an existing industrial and business site, under policy Econ 4 Business and Industry areas. If not removed from the green belt, at the very least, the site should be allocated as an industrial and business site within (and 'washed over' by) the greenbelt. This could take a similar form to RBS Gogarburn, identified by Policy Place 18, or the residential allocation HSG7 at Edinburgh Zoo. Site should be identified as having the potential for further class 5 and 6 development.

REY is a well-established business/industrial park having operated as such since around 1996. It extends to 19.7ha, provides approximately 190,000 sq ft of industrial floorspace (predominantly class 5 and 6) and offers accommodation for a wide range of occupiers. The site is well-let and therefore plays an important role in providing jobs, investment opportunities and helps to meet the city's industrial needs.

REY is a brownfield site located in the green belt as identified by the adopted Edinburgh local Development Plan (2016). The green belt is defined in the adopted LDP and City Plan glossaries as "Land defined in the adopted local plans or local development plans which protects and enhances the landscape setting and identity of Edinburgh and protects and gives access to open space around the city and smaller settlements". As a brownfield site, it stands to reason that REY is incompatible with the reasons for including land within the green belt. The Council's previous Choices document advised that the proposed City Plan 2030 would make green belt amendments as technical changes. We understand that this was to be advised by a green belt review, however, this does not appear to have taken place, likely due to the Council strategy to not release any green field sites, with housing directed to brownfield sites.

In the early stages of preparing the (now adopted) Edinburgh City Local Development Plan, the site was included as one of five sites suggested for removal from the green belt, however this was not taken forward.

Paragraph 51 of Scottish Planning Policy relates to green belts and states:

"The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local Development Plans should show the detailed boundary of any green belt, giving consideration to": (inter alia)

"excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments".

As a large scale industrial operation, the removal of Royal Elizabeth Yard from the green belt, would accord with the above. Furthermore, the removal of Royal Elizabeth Yard from the green belt would not impact on the overall objectives of green belts which are set out in SPP as: to direct development to the most appropriate locations and supporting regeneration; protecting and enhancing the character, landscape setting and identity of the

settlement; and, protecting and providing access to open space.

Object to the city plan outcomes in relation to economic success, as they consider that the plan fails to allocate sufficient business and industrial land to satisfy the needs of the city. We therefore request that their site at Royal Elizabeth Yard is allocated as an existing industrial and business site suitable for future growth with class 5 and 6 uses. This could include bonded warehousing or any other strategic industrial or employment development which may come forward within the plan period. Should the site be allocated, the necessary changes to other parts of City Plan should be made. This would include the strategic mapping diagrams (pages 9 and 10), the proposals map and place policies.

Cinnamon Sedge welcomes the Council's support for existing businesses in the plans outcomes and the support it provides to new economic development opportunities. However, we are concerned that the proposed plan fails to allocate sufficient business and industrial land to satisfy the needs of the city.

At a strategic level, the findings and recommendations of the Commercial Needs Study, identify the need to provide additional locations for business and industrial uses. They therefore support the consolidation and enhancement of Royal Elizabeth Yard as a strategic location for economic / industrial development and support its intensification as a proposed site for new modern industrial use to meet the City's industrial needs.

There is now an even greater need to identify further land for new industrial uses given the Council's strategy to only allocate brownfield sites as locations for housing delivery. The majority of these brownfield sites are currently within active use, including many industrial sites and may require the use of CPO powers, as identified by the Council at paragraph 2.103 of the plan, in order to enable delivery of the sites to take place. If this strategy is to be taken forward, these business will need to relocate elsewhere and further industrial opportunities will need to be identified to accommodate growing demand.

As part of Choices, the Council identified a full list of sites in active industrial or business use to demonstrate what the quantum of loss might be if the brownfield strategy was progressed. Avison Young, as part of the Choices representations, identified that this comprised approximately 87 hectares of land currently used for industrial or business operations. There were a number of sites identified within Choices which are now proposed housing allocations in City Plan. It is clear that as the Council have not allocated additional land (other than the minor alterations to the industrial and business allocation at Newbridge), that this loss of floorspace to sites now allocated as housing sites has not been compensated for elsewhere within City Plan.

The Edinburgh Commercial Needs Study: Mixed Use Delivery (December 2020) identified that a large reallocation of industrial land to other uses would require a very active industrial development programme to reaccommodate even a small proportion of the displaced industrial activity. This would result in occupiers likely relocating to other authority areas.

It is clear from the Study that new locations need to be identified for further industrial floorspace to meet the city's needs and to replace existing floorspace which is now out of date or likely to be lost to other uses. Royal Elizabeth Yard presents an excellent opportunity to deliver new and improved industrial floor space to help meet the city's business/industry needs. The Study also identifies that industrial demand is increasingly

directed towards strategic locations with good transport links on the edge of urban Edinburgh. Royal Elizabeth Yard is located close to the motorway network and meets this requirement. The fact that the existing units are well let also demonstrates the attractiveness of the location.

The proposed plan identifies 10 sites as existing business and employment areas. Only one of these allocations has been increased in size. This is at Newbridge, however the extension to this allocation incorporates a large number of existing industrial properties, therefore the increase in its allocation does not actually allocate much in the way of additional land. The plan does not identify the total land that these proposals provide, however it is noted from a desk based review that a large proportion of these sites already comprise built development which is occupied, and provides limited opportunity for new development to take place, e.g. West Telferton industrial estate has no vacant sites. Whilst land available at Brunstane access is poor (enclosed by railway infrastructure). The few allocations do not provide range or choice of locations. The Council have not demonstrated how the requirement for at least 27ha (CNS) of additional employment land will be met.

REY has the capacity to accommodate further development. Only 25% of site currently utilised. Evidence of demand in paper by Lewis Sutton Property Consultants supports the principle of industrial uses at the REY and therefore that allocation is justified. Development Strategy prepared by OPEN shows the site can deliver 10.5ha of further industrial uses. A place brief may be necessary, and could be agreed in due course, which in principle would provide support for planning applications.

Royal Elizabeth Yard is a brownfield site which lies within the green belt. 'Brownfield land' is defined in the glossary of the City Plan as "land which has been previously developed", as indeed it is in Scottish Planning Policy also. In this particular case, it is therefore beyond any doubt that the site in question is brownfield. Development should always be directed to brownfield land in the first instance, which is the strategy being taken forward by the Council in the preparation of City Plan.

#### Gibson Fitness Ltd (0122)

Object to proposed Policy. Pentland Gait should be included within Policy ECON3 'Office development' and not ECON4 'business and industry'. Pentland Gait includes Currie House and Calder House, both of which are in office use. Policy ECON3 supports office use as part of a wider mix of uses to help meet economic growth and accessibility objectives in the context of the climate emergency. This flexible approach is welcomed and should either also be selectively applied to Policy ECON4, or Pentland Gait office park should be allocated ECON3 because it is; occupied by offices, accessible location, very close to Edinburgh Park/South Gyle which has Special Economic Area status under Econ 3, a struggling office location in need of a wider mix of uses to make it an attractive office location.

#### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

In section 3.238 states that "this policy aims to retain a range of employment sites across the city where new and existing businesses can operate, expand or relocate." It therefore should apply to brownfield sites in Wester Hailes and elsewhere to prevent land having a

change of use that would encourage more commuting. This would be in line with policy Re 4 Alternative Use of Shop Units in the City Centre and Town Centres.

#### Royal Main Group Limited (0501)

The following, unallocated, Royal Mail properties should be allocated under Policy Econ 4;

1. Portobello Delivery Office, 12 Windsor Place, EH15 2AA
2. Edinburgh South East Delivery Office, 5 Bridge End, EH16 4TH
3. Edinburgh South Delivery Office, 19A Strathearn Road, EH9 2AA

Royal Mail wholly support the allocation of their properties for business and industry use and consider this entirely appropriate for the sites. We respectfully request that those Royal Mail sites which are unallocated are instead allocated under Policy ECON4.

The following Royal Mail properties, which are allocated in the Plan for housing development should be re- allocated under Policy Econ 4;

1. Dell Delivery Office, 3 Gorgie Park Road, EH14 1NL (H71)
2. Edinburgh City Delivery Office, 18 Russell Road, EH11 2DJ (H6)
3. Edinburgh North West Delivery Office, 41 Comely Bank, EH4 1AF (H32)
4. Edinburgh West Delivery Office, 21 South Gyle Crescent, EH12 9PB (Edinburgh Park Strategic Business Centre)

This policy wording will therefore help protect the long-term employment use of the sites as is Royal Mail's intention. These properties are important assets for Royal Mail and there is no short, medium- or long-term interest or intention in relocating the Delivery Offices to an alternative location. The housing allocations proposed at each of these sites are therefore not considered to be deliverable and should be removed from the Plan.

An allocation under Policy ECON4 will also address a concern about the potential for conflict with any new development introduced adjacent to their properties which may be sensitive to the nature of the Delivery Office operations. This includes; loading/unloading in external service yards and vehicular movement in the early hours of the morning and at times during the night. Royal Mail has experience of noise complaints from residents who have moved into new residential developments adjoining its operational sites in circumstances where no or insufficient noise mitigation was required as part of the new development. In some cases, these complaints have led to restrictions on the operation of its sites and Royal Mail is concerned that it may even face a situation where is forced to cease operating from a site altogether because of such restrictions. Being able to operate outside normal working hours is critical to its business.

If the Council see fit to retain any proposals for residential use on the land adjoining the properties set out above (assuming the allocation pertaining to each site is removed), the relevant policies and the associated information set out in Appendix D of the Local Plan should make reference to Royal Mail's operations and should ensure that any necessary mitigation is provided by the applicant

#### The Royal London Mutual Insurance Society Ltd (0149)

Identify Royal London's land holding at Seafeld Way as land for business and industry and allocate land for business and industry under Policy Econ 4. Royal London's land

holding should be identified as an 'employment centre' on map 1 and 'business and industry area' on map 2.

The Plan strategy's over-riding land use objective is to meet its housing land requirements on brownfield land which entails the redevelopment of around 30% the City's established industrial stock. Not only does this undermine the City's established industrial stock but it will exacerbate the limited industrial supply which may be suppressing or displacing demand, particularly in the sub 5,000 sqft market. Whilst Royal London objects to the scale of the brownfield housing strategy in principle, it also recognises that its land holding plays a valuable role in the City's industrial supply which needs to be safeguarded and identified for business and industry. This responds to para 2.140 second bullet.

The estate has been under Royal London's ownership for in excess of 25 years and performs a long-term strategic function, being one of the larger complete industrial holdings within their property fund. Significant capital investment has been deployed over recent years to ensure the accommodation is fit for modern requirements. The estate is 100% let and tenant leases are in place until November 2036, which is beyond the duration of the Plan. Royal London's land holding comprises an industrial estate with 18 units which accommodate a range of Class 4, 5 and 6 users and one unit, presently in Class 1 use and occupied by the retailer, Matalan. The landholding is situated in a location well suited for employment use within the City's established urban area. It is accessible by foot, cycle and vehicle. Vehicular access to the site is via Seafield Road (A1) to the north a main road artery and close to a rail line.

The detail within their MIR representation remains relevant and is to be considered as part of their objection.

### **Policy Econ 5 Employment Sites and Premises**

Steve Loomes (0767), Barratt David Wilson Homes (0677), Homes for Scotland (0404)

Econ 5 (Employment Sites and Premises) – how does this policy align with the allocation of new housing sites on existing employment sites

Abrdn (0425)

Criteria c) of policy Econ 5 (p.135) should be revised to apply to sites over 1ha (as per adopted policy Emp 9). Additional wording or supporting text should also be added to the policy to provide applicants with the opportunity to justify redevelopment of business floorspace for alternative uses, such as housing, for example where expert opinion is that demand for office or other employment in a particular location is too low to support its existing quantum or its continued inclusion.

Abrdn do not support the inclusion of this policy as currently worded, particularly criteria c). It is important that policies such as this incorporate sufficient flexibility to respond to the specific circumstances of individual sites and do not unreasonably restrict redevelopment of unviable business locations to uses more appropriate to their context.

Mr T Klan (0307)



Remove 'in the urban area' in first and second sentence of the Policy. There are many existing business premises that are not located in the urban area. There will be many more enterprises or businesses that may want or need a more peripheral or out of centre location. This is particularly the case if the Council's aspiration of relocating existing business and industry uses to facilitate brownfield housing development. This policy will restrict further the availability of employment land and premises, to the detriment of the economic growth of the city.

Melford Developments Ltd (0308)

Policy requires further clarification. Does first sentence in policy refer to LDP allocated business sites? Or does it just mean all proposals for new employment sites in the urban area will be supported?

Object to Clause (c) as this requires further clarification and explanation. Will this be the case for redevelopment of Proposed Plan commercial sites into housing sites?

This policy is imprecise and does not give clear guidance in terms of requirements for mixed use developments.

Scottish Property Federation (0144)

Paragraphs 3.239 - 3.241. While the SPF supports the principle of mixed-use developments, we fear that this policy could threaten to remove key commercial sites from the city centre. This could include important sites to redevelop leisure uses which will be vital to supporting the experience economy that is vital to the wider economic success of the city. The Policy should be rephrased to be clear that key sites for purely commercial uses, critical to the wider attraction of Edinburgh as a destination for major corporate occupiers, for industrial sites and for retail and leisure uses may still be considered.

Tarmac (0244)

Proposed a number of changes to the Policy text and supporting text to support proposals that are not within the urban area. There are many existing business premises that are not located in the urban area. There will be many more enterprises or businesses that may want or need a more rural location. This is particularly the case if the Council's aspiration of relocating existing business and industry uses to facilitate brownfield housing development.

The last known use for part of the Bairdview site was as a concrete batching plant and it is therefore covered by Emp 5. The proposed site is not in the urban area although it is in proximity to the built-up area, as many employment sites are. Accordingly, the policy as it stands is inflexible and overly restrictive.

Hallam Land Management (0615)

There are many existing business premises that are not located in the urban area, Craigiehall included as it was last in use for employment purposes.

There will be many more enterprises or businesses that may want or need a more peripheral or out of centre location. This is particularly the case if the Council's aspiration

of relocating existing business and industry uses to facilitate brownfield housing development. This policy will restrict further the availability of employment land and premises, to the detriment of the economic growth of the city.

If rural employment land and premises is not supported then part of the Craigiehall site will remain vacant and soon become derelict. Queen Elizabeth Yards is another example that would fall foul of this policy.

### **Responses supporting the policy**

#### Ryden LLP (0578)

Brownfield sites identified for residential led development should not need to justify the loss of employment land. The new strategy is to promote brownfield development and we support the distinction made for redundant or vacated business sites where they are identified as part of the wider development strategy.

ECON 5 Employment Sites And Premises and the specific reference to Place Policies 16-21 and support for such sites to be redeveloped for mixed use development including housing in order to contribute towards meeting the city's housing requirements is supported.

### **Policy Econ 6 Hotel Development**

#### Brian Tiplady (0641)

Policy assumes that increasing tourism is a good thing and makes no mention of the costs in terms of congestion and inconvenience imposed on ordinary residents. Should be no increase in overall tourist accommodation, including short-term lets, should without a full evaluation of impacts, and without it being clear that a majority of the city's residents approve such an increase.

#### Cockburn Association (0777)

Clarification is required on the relationship between the objectives of Econ 6 and those of Econ 2 for which seeks to 'create sustainable communities, maximise opportunities for housing and avoid large mono use developments.

#### Cramond & Barnton Community Council (0243)

Policies for hotel accommodation should be widened in scope to include all serviced visitor accommodation. Policies for any further expansion of visitor accommodation should be based on a robust review of the visitor accommodation sector, within the context of an overall sustainability assessment of tourism in Edinburgh. The policy should apply equally to all types of serviced accommodation. The Policy encourages new hotel provision, albeit with guidance on locations, but ignores and may exacerbate the unrelenting growth of tourism pressures on the Edinburgh community and the fabric and ambience of the City and result in over-supply issues. The provision of visitor accommodation should be managed at sustainable levels.

#### Crosswind Developments Ltd (0184)

Seek clarification on point b of Econ 6 Hotel Development as it advises hotel development will be permitted within the boundaries of Edinburgh Airport, the Royal Highland Centre and West Edinburgh. The inclusion of the place policies within the body of text would provide clarification on the exact of the boundaries. Modifications to policy identified. In addition, it is important that Edinburgh Airport (as covered by Place 17), the Royal Highland Centre (as covered by Place 20) and West Edinburgh (as covered by Place 16) are identified on the Proposals Map.

#### Living Streets Edinburgh Group (0486)

In addition to requiring development to be in locations accessible by public transport the Council could also require that there is no car parking provision to be made other than for disabled and essential servicing.

#### VisitScotland (0689)

Welcome the recognition given to tourism as the third biggest source of employment in Edinburgh and the subsequent reflection in policy of the importance of hotels to generating economic benefit from growth in tourism. To further improve this policy it would be appropriate for the planning authority to take a strategic view of the type and quality of hotels the City is looking to develop going forward.

Note that there is an acknowledgement (para 3.242) that much of the increase in provision has been in the budget hotel sector. One of the key priorities of Scotland Outlook 2030 is to grow the value of tourism benefits across Scotland. To achieve this in the hotel accommodation sector, Edinburgh is well placed to capitalise on provision of high-quality hotels which concentrate on delivering more value in the areas identified for potential hotel/tourism development in the Plan. Doing so will ensure the value of tourism to Edinburgh's economy continues to increase, and delivers shared prosperity for all, by encouraging the right growth in the right areas.

Proposals which move away from quantity toward quality will be more likely to attract the right kind of inward investment. Essentially, if we can improve the quality of our experiences by improving our infrastructure, facilities and services we can create the right conditions for further growth and investment.

#### Hallam Land Management (0615)

Modified text suggested for policy. This policy would not support any hotel proposal outside the urban area, which is not appropriate. Why would the Council not be supportive of a country house or boutique hotel proposal in a rural location? There is high demand for accommodation in such locations, particularly since 'staycation' holidaying is becoming much more popular. The hotel market is dynamic and diverse, many people do not want hotel accommodation in the City Centre or adjacent to busy transport hubs. Policy Econ 6 is overly and unnecessarily restrictive and demonstrates a misunderstanding of an evolving hotel market in the city. On the basis of the current policy as phrased it is likely that a hotel application as part of a mixed-use development would not be permitted without a policy change. Together with the brownfield land approach this places a serious constraint on an active market seeking to fill the gap created by short-term letting policies.

### T Klan (0307)

Modify criterion d) of the policy. This policy as it stands would not support any hotel proposal outside the urban area, which is not appropriate. Why would the Council not be supportive of a country house or boutique hotel proposal in a rural location? The hotel market is dynamic and diverse, many people do not want hotel accommodation in the City Centre or adjacent to busy transport hubs.

### Edinburgh World Heritage (0339)

Modify policy to ensure appropriate conservation of the historic environment.

### **Responses supporting the policy**

Ambassador Group (0683), CBRE Global Investors (0644), HCPII Properties 101LP (0517), Nuveen Real Estate (0734), West Town Edinburgh Ltd (0660), Creos Property Limited (0253), Elgin Haymarket Limited (0292), Ryden LLP (0578)

### **Policy Econ 7 Goods Distribution Hubs**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Could Edinburgh's rail network play a role in developing this?

### Leith Central Community Council (0614)

Plan should provide for the introduction of on-street logistics hubs (with lockers) to reduce traffic from delivery vans and to support shop deliveries; this requires supporting measures (well-maintained, smooth pavements and good road crossings for trolleys) which will also benefit and prioritise pedestrian traffic.

### Hallam Land Management (0615)

Whilst the plan suggests that household expenditure has not grown and that there is sufficient convenience floorspace, there is no real consideration of the need for local logistics and distribution hubs. Such a facility could potentially co-exist with other uses at Craigiehall utilising some of the building stock in a sustainable way, providing that the scale was limited.

### **Responses supporting the Policy**

Ryden LLP (0578)

### **Economy General**

Defence Infrastructure Organisation (0124)

Request the inclusion of a policy that covers military sites or adjacent areas. The Defence Estate Optimisation Portfolio (DEOP) seeks to optimise the existing MOD estate and enhance the quality and efficiency of capability delivery. In doing so DEOP need to reduce estate running costs and the size of the estate. DEO Generated Force

(GF) is the Army programme which covers the re-provision of infrastructure for the Units displaced by the site disposals announced under the Better Defence Estate (BDE) programme. In this case Dreghorn Barracks will be retained as a receiving site for service personnel based in Edinburgh and associated development will be required. The DIO considers that, City Plan 2030 should highlight the important role the MOD has as a significant employer in the city and should be supportive of any future growth at Dreghorn Barracks.

LPBZ Commercial Ltd (0391)

The Proposed Plan begins with setting out a list of documents that support the policies outlined in the plan. LPBZ would like to highlight that this list does not include any specific note, assessment, appraisal or report relating to employment land in the city. As a Housing Technical Note is included in this list, LPBZ would question why there is not an equivalent for Employment land included. The plan appears to rely on a Commercial Needs Study dated November 2018. Without an up-to-date background document/supporting information available to back up employment and mixed-use policies in the plan, LPBZ would question whether these policies have been adequately evidenced and will stand up at examination.

Lorraine Smith (0462)

On a general note it is disappointing that arts do not figure in these proposals. Again, Edinburgh's attraction (both for residents and the substantial numbers of tourists) is its reputation as a city of culture. However, it seems that this is not to be supported by the council in this development plan - there is no accommodation for artists or the creative arts.

**Table 13 Areas of Economic Importance**

Royal Highland & Agricultural Society of Scotland (0482)

Text in Table 13 should be edited to include hotels (plural) in terms of uses defined by the by the masterplan principles and consistent with Policy Econ 6 which is supported.

The site initially suggested as an alternative allocation at Norton Park is not supported and RHASS supports its removal. The site is isolated, ahead of any infrastructure provision and residential development would detract from landscape, environmental and green belt objectives.

Lynn Grattage (0362)

"West Edinburgh  
National Planning Framework 3 identifies West Edinburgh, including the land identified as the International Business Gateway, as being a significant location for investment."  
Table 13

I don't really understand this. The Glasgow road to Edinburgh centre is already too congested, and who wants to live or work under an airport?

## **Modifications sought by those submitting representations:**

### **Policy Econ 1 Supporting Inclusive Growth, Innovation and culture**

#### SEPA (0012)

In line with the fundamental aims of the plan, SEPA advise that the Nature-based solutions (NBS) sector is listed in first line of policy Econ 1 and the reasoning for this prioritisation explained in underlying sections of the policy.

#### Cockburn Association (0777)

Include a reference in policy Econ 1 to lifelong learning.

#### Crosswinds Developments Ltd (0184)

Amend Econ 1 to the following:

“Proposals for development associated with social enterprises, business start-ups, new and emerging industries, university linked education, research and innovation, and culture will be supported in principle, where they meet relevant LDP policies and are associated with one of the following:

- a. Addressing poverty and inequality
- b. Edinburgh city centre transformation
- c. Edinburgh’s cultural festivals and events throughout the city
- d. Edinburgh’s universities and colleges
- e. Life science research
- f. Economic development”.

#### Edinburgh Napier University (0731)

Include a reference to collaboration and the need for a partnership approach to the policy. Identify further and higher education institutions on the Proposals Map if they are supported by Econ 1.

#### Leith Central Community Council (0614)

The policy should also explicitly mention the need to safeguard existing social enterprises, business start-ups, university linked education, research and innovation, and culture.

#### National Galleries of Scotland (0725)

Add additional criterion f to policy, as follows:

f. National cultural institutions based in Edinburgh, including National Galleries of Scotland.

#### NHS Lothian (0596)

The policy should be amended to add a reference to supporting development associated with the health and care system.

#### University of Edinburgh (0464)

The policy should be amended to add an explicit reference to further support and continuation of activity in the university related sector in order to further strengthen the role and importance of the University to the city.

Policy should be amended to actively encourage proposals where they have a direct linkage to the knowledge economy and support further enhancement and development of University and Innovation facilities. This could be strengthened with direct reference to the need to support proposals contained within Estate Strategies prepared by higher education institutions, and with a focus on specific opportunities for enhancement and development of facilities where these further the aims of the sector and knowledge economy across the city.

There should be scope in the Plan to provide policy specific support for established initiatives and areas of concentration of academic, research and innovation and collaboration activity. This would include areas such as the Edinburgh BioQuarter, Lauriston Innovation district, and Kings Buildings.

The Lauriston Innovation District should be afforded appropriate recognition in the plan, either through a specific Place policy or definition as an area of economic importance (as is the case with both designations at BioQuarter).

The plan should be amended to identify the university related facilities across the city and provide specific related policy support. The University would be pleased to discuss and agree suitable wording for place or innovation specific policies.

#### Edinburgh World Heritage (0339)

Modify Policy by addition of bullet in the main policy wording as follows:

- “Protecting and enhancing Edinburgh’s outstanding historic environment”

Modify supporting text as follows:

“...for Edinburgh’s Economy, including protecting the historic environment as an important and irreplaceable economic and cultural asset.

#### **Policy Econ 3 Office Development**

##### Aviva Life and Pensions UK Limited (0598)

Modify policy to make reference within the Policy to sustainability standards and the need to ensure that the requirements of modern occupiers are considered from the outset of development projects.

##### Crosswind Developments Ltd (0184)

Modify plan to identify H61 Crosswinds as a strategic business centre.

##### Elgin Haymarket Limited (0292)

Modify the policy to add the term ‘20-minute city hubs’.

Hallam Land Management (0615)

Modify policy to allow reuse of the Craigiehall site to be in accord with the policy requirements e (i) and (ii).

Juniper Green & Baberton Mains Community Council (0306)

Modify policy so that further office development in the city centre is not encouraged, but instead encouraged elsewhere to support and be consistent with the 20-minute neighbourhood.

Leith Central Community Council (0614)

Modify policy to require a range of mixed use units and variety of smaller units at street level.

Living Streets Edinburgh Group (0486)

Modify policy to require that there is no car parking provision to be made other than for disabled and essential servicing.

LPBZ Commercial Ltd (0391)

Modify policy to remove “preferably as part of business led mixed use proposals”. Modify wording of this policy to ensure that small scale office proposals, particularly where they facilitate the expansion of an existing nearby business and are located in sustainable locations, do not need to carry out a sequential test or impact assessment.

Melford Developments Ltd (0308)

Threshold of 2500 sqm which does not seem to be reasonable in a city centre location.

Archie Clark (0003), Scottish Property Federation (0144)

No modification proposed.

Shelborn Edinburgh Limited (0732)

Modify policy to make reference to the needs of modern office occupiers is changing and post-Covid it is expected that users will be focused on sustainability and staff wellbeing.

The Institute of Chartered Accountants of Scotland (0182)

Modify the plan to include a reference to Haymarket Yards within the Proposed Plan.

Modify the Plan to introduce a policy protecting existing business uses.

Edinburgh World Heritage (0339)



Modify the policy by adding the following bullet; "Where appropriate in the context of other policies, including the conservation of the historic environment."

#### **Policy Econ 4 Business and Industry Areas**

##### Brain Tiplady (0641)

Modify policy to address travel, particularly public transport. Also add policies for identifying employment centres with poor public transport access and improve it or promote shifts of employment to better serviced centres.

##### Diana Cairns (0452)

Modify policy to specify a comprehensive list of types of development that would and would not be allowed on such sites should be included.

##### Cinnamon Sedge Ltd (0594)

Modify plan to remove Royal Elizabeth Yard (REY) site from the green belt on the proposals map and allocated as an existing industrial and business site, under policy Econ 4. If not removed from the green belt, the site should be allocated as an industrial and business site within (and 'washed over' by) the greenbelt. This allocation should be supported by related amendments to other diagrams within the plan and other supporting documents of City Plan including the proposals map and place policies.

Supporting text 3.238 should be amended to specifically reference REY.  
A place brief may be necessary, and could be agreed in due course, which in principle would provide support for planning applications.

##### Gibson Fitness Ltd (0122)

Modify Policy Econ 3 to include Pentand Gait and remove it from Policy Econ 4.

##### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Modify plan to apply the policy to brownfield sites in Wester Hailes and elsewhere across the City to prevent, where possible, land having a change of use that is going to encourage more commuting.

##### Royal Main Group Limited (0501)

The following, unallocated, Royal Mail properties should be allocated under Policy Econ 4;  
Portobello Delivery Office, 12 Windsor Place, EH15 2AA  
Edinburgh South East Delivery Office, 5 Bridge End, EH16 4TH  
Edinburgh South Delivery Office, 19A Strathearn Road, EH9 2AA  
Dell Delivery Office, 3 Gorgie Park Road, EH14 1NL (H71)  
Edinburgh City Delivery Office, 18 Russell Road, EH11 2DJ (H6)  
Edinburgh North West Delivery Office, 41 Comely Bank, EH4 1AF (H32)  
Edinburgh West Delivery Office, 21 South Gyle Crescent, EH12 9PB (Edinburgh Park Strategic Business Centre)

The Royal London Mutual Insurance Society Ltd (0149)

The wording of the Policy itself is acceptable however the policy should identify Royal London's land holding at Seafeld Way as land for business and industry (Econ 4). Royal London's land holding should be identified as an 'employment centre' on map 1 and 'business and industry area' on map 2, and make associated changes to the Proposals Map.

**Policy Econ 5 Employment Sites and Premises**

Steve Loomes (0767), Barratt David Wilson Homes (0677), Homes for Scotland (0404), Melford Developments Ltd (0308)

No modification identified.

Abrdn (0425)

Modify Criteria c) of policy Econ 5 (p.135) to apply to sites over 1ha.

Mr T Klan (0307)

Modify Policy to remove 'in the urban area' in first and second sentence.

Scottish Property Federation (0144)

Modify policy to be clear that key sites for purely commercial uses, critical to the wider attraction of Edinburgh as a destination for major corporate occupiers, for industrial sites and for retail and leisure uses may be considered.

Tarmac (0244), Hallam Land Management (0615)

Modify policy to remove 'in the urban area' in first sentence. Remove 'in the urban area' in clause (a). Add new para 3.239 to cover first part of this policy 'This policy covers both the creation of new premises and also the redevelopment of existing employment sites or premises'. Alter existing para 3.239 to say 'When considering redevelopment of existing sites or premises, last in use for employment purposes not covered .... the policy provides support for ....'

**Policy Econ 6 Hotel Development**

Brian Tiplady (0641)

Policy should require an evaluation of impact and the support of the majority of the city's residents.

Cockburn Association (0777)

No modification suggested.

Cramond & Barnton Community Council (0243)

The policy should be modified to apply equally to all types of serviced accommodation.

Crosswind Developments Ltd (0184)

Modify policy to the following;

“Hotel development will be permitted:

- a. in the City Centre where developments may be required to form part of mixed-use schemes, if necessary, to maintain city centre diversity and vitality, especially retail vitality, on important shopping frontages
- b. within the boundaries of Edinburgh Airport (as covered by Place 17), the Royal Highland Centre (as covered by Place 20) and West Edinburgh (as covered by Place 16).
- c. in defined town, local and commercial centres
- d. in locations within the urban area with good public transport access to the city centre.”

Living Streets Edinburgh Group (0486)

Modify policy to state in addition to requiring development to be in locations accessible by public transport the Council also require that there is no car parking provision to be made other than for disabled and essential servicing.

VisitScotland (0689)

Modify the plan’s policy to take a strategic view of the type and quality of hotels the City is looking to develop going forward.

Hallam Land Management (0615)

Modify policy as follows;

Add clause (e) – ‘in exceptional circumstances where a hotel could be accommodated into an existing building and would contribute positively to effective re-use, re-development or regeneration of a wider area’.

... Or, alternatively, alter clause (d) to remove the words ‘within the urban area’.

T Klan (0307)

Modify clause (d) to remove the words ‘within the urban area’.

Edinburgh World Heritage (0339)

Modify Policy to add the following bullet; “Where appropriate in the context of other policies, including the conservation of the historic environment”.

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Modification inferred, adding reference to rail network to deliver Good Distribution Hubs.

Leith Central Community Council (0614)

Modify policy to provide for the introduction of on-street logistics hubs (with lockers)

Hallam Land Management (0615)

Modify plan to include a logistics facility as part of proposed Craigiehall site.

## **Economy General**

### Defence Infrastructure Organisation (0124)

Modify plan to include the following as policy;

1. Proposals associated with defence and military operations will be supported at existing sites where they would enhance or sustain operational capabilities.
2. Non-military or non-defence related development within or in the areas around a defence or military site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.

### LPBZ Commercial Ltd (0391)

No modification identified.

### Lorraine Smith (0462)

No modification identified.

### Royal Highland & Agricultural Society of Scotland (0482)

Modify text in table 13 to include hotels (plural) in terms of uses defined by the masterplan principles and consistent with Policy ECON 6. Remove reference to relocation of the Royal Highland Centre.

### Lynn Grattage (0362)

No modification identified.

## **Summary of responses (including reasons) by planning authority:**

### **Policy Econ 1 Supporting Inclusive Growth, Innovation and culture**

#### SEPA (0012)

The Council considers the strategy and the aims of the plan seek to support sustainable growth whilst also supporting net zero development. These aims are delivered through the policies and proposals in the plan, in particular, by maximising use of brownfield rather than greenfield land (aim 2) and by requiring all new buildings to be net zero (aim 4). The Plan supports 'nature based solutions' in Policy 6 Green Blue Infrastructure and the Council considers the reference to 'innovation' in Policy Econ 1 sufficient to embrace such solutions, the detail of which may vary over time as inventive solutions are developed and progressed.

**No modification proposed.**

#### Cockburn Association (0777)

The Council welcomes support for the policy but considers a reference to “life long learning” too vague in the context of delivering the objectives of the policy and providing a clear steer when determining planning applications. The Council considers the reference in criterion d. to Edinburgh’s universities and colleges is more appropriate and would sufficiently cover development proposals in relation to education. **No modification proposed.**

Crosswinds Developments Ltd (0184)

The Council welcomes support for the policy but considers the proposed changes to the policy too broad and vague. The Council considers the reference to “research and innovation” would be relevant to proposals related to the tech industry. The Plan should be read as a whole and there are other policies to guide proposals for business and industry, including the tech industry, such as Econ 3, Econ 4 and Econ 5. The purpose of the policy is to support proposals for inclusive growth, research and innovation, and culture and the changes would extend the policy beyond this intended focus. Furthermore, Place Policy 16 West Edinburgh is supportive of a mix of uses in west Edinburgh including office, light industrial and industrial uses, the details of which will be established through the master plan approach, which the Council considers would provide policy support for tech industries. **No modification proposed.**

Edinburgh Napier University (0731)

The Council welcomes support for the policy and considers the policy to be sufficiently flexible. The Council is supportive of working with the University, however, does not consider a specific reference to collaboration and a partnership approach in the policy, with regard to universities, would be helpful and could potentially be restrictive and difficult to implement. In addition, a reference to collaboration is included within the supporting text in paragraph 3.230. **No modification proposed.**

The Council does not consider there is a need to specifically identify the further and higher education institutions within the Edinburgh urban area on the proposals map, as there are no site specific policies that are required to cover these established uses. The Proposal Map does identify Heriot Watt University Riccarton campus as it is covered by a specific policy, Place 21. However, the circumstances are very different as the campus has an important and sensitive relationship with the adjacent green belt. **No modification proposed.**

Leith Central Community Council (0614)

The Council considers the purpose of the policy is to support development proposals being brought forward. The Council considers that extending the Policy’s remit to protect existing social enterprises, business start ups, education, research and innovation would make the policy undeliverable or difficult to implement, particularly where an existing business, due to changes in market trends, was no longer viable. **No modification proposed.**

National Galleries of Scotland (0725)

The Council welcomes support for the policy, however, it considers the references to culture in the policy to be sufficient and further detail to guide implementation is set out in para 3.231. Proposed alteration is too specific to a particular cultural institution. **No modification proposed.**

#### NHS Lothian (0596)

The Council recognises the importance of the health and wellbeing of the population of Edinburgh and as a result there are numerous references to the importance of these issues in the plan, for example a key outcome of the plan is “a sustainable city which supports everyone’s physical and mental wellbeing”. Various measures and policies are included within the plan that will assist, for example, the delivery of a green blue network and the importance of a healthcare appraisal to identify the impacts of the development on healthcare infrastructure. The Council considers the key aims of Policy Econ 1 are to deliver “inclusive” or “good” growth built round two priorities of inclusion and innovation as identified in the Council’s Economy Strategy and referred to in para 3.230. In addition, the policy in criterion a. supports proposals related to poverty and inequality, which are the key causes of negatives impacts on health and wellbeing. As a result, the Council considers an additional reference to health and wellbeing in this policy is unnecessary. **No modification proposed.**

#### University of Edinburgh (0464)

The Council welcomes support for the policy and recognises the important contribution that the universities make to the Edinburgh economy. However, it considers the references to Edinburgh’s universities and colleges in the policy to be sufficient. The policy specifically identifies education, research and innovation in the text as does the supporting text. The Council considers the proposed wording is flexible and would provide support for proposals associated with universities including innovation and learning. More detailed or specific references to universities and their proposals could potentially reduce the flexibility of the policy, carrying the risk of making the policy out of date should plans change making it more difficult to implement. **No Modification proposed.**

The City Centre Transformation Strategy (CD060) aims to change the way we move around the city centre making it more people friendly and inclusive as set out in para 3.7 of the Plan. The Plan supports the aims and objectives of the strategy, and it is identified in criterion b of the Policy. The Council does not consider is necessary to set out further details on the transformation project, to ensure the plan remains flexible to accommodate potential changes to the project as it progresses and in turn this will ensure the policy remains deliverable. **No modification proposed.**

The Council recognises the importance of the University of Edinburgh and its estate. By including the University’s estate within the built up area, there is a general presumption in favour of the expansion of university facilities where the other policy requirements of the plan are met, which provides strong policy support and flexibility. With regard to the Heriot Watt Campus, its green belt location requires a more specific policy approach. The policy supports development only where it accords with an approved master plan. The Council considers such an approach would not be appropriate for the University of Edinburgh estate. **No modification proposed.**

#### Edinburgh World Heritage (0339)

The Council considers the plan needs to be read as a whole. There are numerous policies within the plan that seek to protect Edinburgh’s Heritage as set out in the Environment and design policies section. The Council considers the key aims of Policy Econ 1 are to deliver

“inclusive” or “good” growth built round two priorities of inclusion and innovation as identified in the Council’s Economic Strategy and referred to in para 3.230. As a result, the Council considers an additional reference to Edinburgh’s heritage is unnecessary. **No modification proposed.**

### **Policy Econ 3 Office Development**

#### Aviva Life and Pensions UK Limited (0598)

The Edinburgh city centre as shown on the Proposals Map includes Haymarket. The policy states that high quality office developments will be permitted in the city centre as identified on the Proposals Map. As a result, the Council considers a specific reference to Haymarket in the policy is unnecessary. Furthermore, there is a reference to Haymarket in the supporting text in paragraph 3.234. **No modification proposed.**

#### Crosswind Developments Ltd (0184)

The Crosswinds (H61) site is adjacent to the West Edinburgh Strategic Business Centre. The site is within West Edinburgh and Place Policy 16 applies. This sets out a series of development principles to guide development in West Edinburgh. Criterion o. states that master planning will establish how a mix of uses is distributed across the area. It states that the mix will include offices. Therefore, it would be inappropriate to identify the Crosswinds site as a strategic business centre in advance of this. **No modification proposed.**

#### Elgin Haymarket Limited (0292)

The Council considers the city centre is one of the most accessible parts of Edinburgh, as indicated in paragraph 3.234. Adding a specific reference to ‘20-minute city hubs’ would require an appropriate definition and could create the risk of a less flexible policy. It is unclear how the reference could be incorporated. As a result, the Council does not consider such an alteration would help further support higher density office led mixed use development, and conversely could create confusion and or hinder the application of the policy. **No modification proposed.**

#### Hallam Land Management (0615)

The Council considers a key aim of the policy is to support office development in identified centres where they have excellent accessibility. Where proposals are outwith those defined centres, the policy requires proposals to have high levels of accessibility to public transport and active travel. As the Craigiehall site is in the green belt and does not have good accessibility by public transport or active travel it is not considered a preferable location for office development and therefore is contrary to the purpose or aims of this policy. **No modification proposed.**

#### Juniper Green & Baberton Mains Community Council (0306)

The Council considers there is plenty of evidence, for example reflected by low vacancy levels, to suggest there is continuing demand for office space in the city centre as set out in the Commercial Needs Study: Office Market report (CD034) prepared by Ryden on behalf of the Council. Even post Covid Edinburgh city centre remains a prime location for

office development demand, as reflected in some of the commercial responses received to the Plan. The Plan continues to support further office development in the city centre as it is a prime location for office development due to its proximity to other offices, services and existing public transport hubs, e.g. rail, bus etc giving it excellent accessibility to the Edinburgh population. The policy is supportive of office development in other accessible locations across the city and has been amended to include a reference to commercial centres. The Council considers the Plan should be read as a whole and the Policy as written will be supportive of the 20 minute neighbourhood approach. As a result, the Council does not consider an alteration is required. **No modification proposed.**

Leith Central Community Council (0614)

The Council agrees, and considers the policy as written does not preclude different sizes of offices being provided. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council notes the support for the policy in principle. The Council considers the plan must be read as whole. Matters relating to parking are more appropriately dealt with in the transport policies. Policies Inf7, 8 and 9 address parking. The parking policies are seeking to discourage off street parking. For example, an office development with inclusive parking would be contrary to policy Inf 9 City Centre Public Parking. **No modification proposed.**

LPBZ Commercial Ltd (0391)

Policy Econ 3 is largely carried over from the adopted LDP but with the inclusion of commercial centres as being a preferred location, on the grounds they have good accessibility. A key aim (Aim 10) of the Plan is to deliver Edinburgh's economic land use needs as part of mixed use development. Large business areas such as the Strategic Businesses Centres have the opportunity to provide a mix of uses which will strengthen them and provide benefits in terms of delivering 20 minute neighbourhoods, improving active travel and public transport mode share. Promoting mono use areas runs contrary to the underlying strategy of the plan. The Council does not consider including an exclusion from the sequential provisions of the policy for small scale proposals is justified and it should be noted that proposals below 2,500sq m do not have to provide an assessment of impact. The policy seeks to ensure that proposals outwith the identified locations are in accessible locations to discourage private vehicle trips in the context of the plan's aim to ensure the growth of the city is sustainable and net-zero. That being the case the Council considers the sequential approach is justified. **No modification proposed.**

Melford Developments Ltd (0308)

The requirement for an assessment of impact of proposals on town centres exceeding 2,500 sq m only applies to proposals in "other accessible mixed use locations". It does not apply to proposals in the city centre. **No modification proposed.**

Archie Clark (0003)

The Council considers there is continuing demand for office development in the city centre as set out in its response to 0306 above. The Council considers the strategy of the plan



seeks to support office development throughout the city on strategic business centres, in designated centres and in other accessible locations which will assist in delivering 20 minute neighbourhoods. **No modification proposed.**

Scottish Property Federation (0144)

A key aim (Aim 10) of the Plan is to deliver Edinburgh's economic land use needs as part of mixed use development. As referred to in paragraph 3.235 the Council considers the city centre in particular has an opportunity to provide office development as part of other developments. This is important given the low vacancy rate of offices in the city centre and the demand for additional high quality office floorspace. A further reference to a mix of uses can also be found in Policy Place 1 Edinburgh City Centre. Therefore, the Council considers it reasonable to seek office floorspace as part of mixed use development. **No modification proposed.**

Shelborn Edinburgh Limited (0732)

Matters relating to the quality of internal office floorspace for the purposes of ensuring staff well being are more appropriately dealt with in terms of building standards requirements. **No modification proposed.**

The Institute of Chartered Accountants of Scotland (0182)

Haymarket yards is within the City Centre boundary, as defined on the proposals map, at Haymarket and is considered a prime office location. The Plan is supportive of office development within the city centre and there is a reference to Haymarket in para 3.234. The Council considers a specific reference to development at Haymarket yards as a key city centre destination is unnecessary, as the plan already captures the importance of the Haymarket area as a whole. **No modification proposed.**

The Council considers the inclusion of a policy within the plan protecting the loss of businesses would be very difficult to implement and could hinder investment in new developments. The Council consulted on a loss of office approach in Choices for City Plan 2030 and received a lot of objection from the development industry. The council considers the policies in the plan, Econ 3 Office Development and Place 1 Edinburgh City Centre, provide the right balance supporting office development and compatible uses in the city centre. **No modification proposed.**

Edinburgh World Heritage (0339)

The Council considers the plan needs to read as a whole. There are numerous policies within the plan that seek to protect Edinburgh's Heritage as set out in the Environment and design policies section. As a result, the Council considers an additional reference to Edinburgh's heritage is unnecessary. **No modification proposed.**

**Policy Econ 4 Business and Industry Areas**

Brain Tiplady (0641)

Policy Econ 4 has been carried over from the previous adopted LDP (CD039) and therefore is established development plan policy. It seeks to protect existing business,

industry and storage sites identified on the Proposals Map from changes of use that would result in loss of floorspace for these uses. The Council considers the plan should be read as a whole. Matters related to travel and access to public transport etc are more appropriately covered by the transport policies set out in the plan. For example, Policy Inf 5 requires proposals that are likely to generate significant travel demand to be on suitable sites with very good accessibility by sustainable transport. As a result, the Council considers alterations to Policy Econ 4 to address travel is unnecessary. **No modification proposed.**

Diana Cairns (0452)

Policy Econ 4 has been carried over from the previous adopted LDP (CD039) and therefore is established development plan policy tested at Examination. It seeks to protect existing business, industry and storage sites identified on the Proposals Map from changes of use that would result in loss of floorspace for these uses. The Council considers it would be too inflexible and presumptuous to specify in the policy the specific types of uses that would be acceptable on the Sir Harry Lauder Road site. Proposals should be considered on a case by case basis through the planning application process, which will give adequate opportunity to consider a wide range of planning issues including environmental impacts. **No modification proposed.**

Cinnamon Sedge Ltd (0594)

The Royal Elizabeth Yards (REY) is a long established historical use within the Edinburgh green belt. The buildings were constructed as a depot to supply Royal Navy ships at Port Edgar just after the World War 2. The Council does not consider the REY is comparable to the Royal Bank Headquarters which is identified as an Area of Economic Importance, and is a high quality development located within a Special Landscape Area, with excellent accessibility from a range of sustainable transport modes, in particular the Edinburgh tram. The REY site was identified as part of the green belt in the current adopted LDP (CD039), which was subject to examination. The site and its current use remain unchanged since the last plan was prepared so there has been no material change in circumstances that justify removal of the site.

Scottish Planning Policy in paragraph 49 states that development plans may designate a green belt around to city to support the spatial strategy by “directing development to the most appropriate locations and supporting generation” and “protecting and enhancing the character, landscape setting and identity of the settlement”. The draft NPF4 (CD099) continues to set a similar context for green belts. Whilst it is recognised that this site is not visually prominent and enclosed by woodland the Council considers it would be inappropriate to remove the site from the green belt as it forms part of a continuous swathe of green belt from Queensferry to Cramond and needs to be viewed in that context.

The REY is already currently operating as business and industrial use and has been since 1996 within its green belt setting. Its current location within the green belt does not prevent the business operating in its existing form. However, the REY is not in a location where the Council would normally support such a use, and with regard to the greenbelt would prefer to direct this type of development to a more appropriate urban location. It is in a remote location, with poor quality local road connections to the strategic network. It does not have good accessibility by sustainable transport modes and as a result is not in a location where the Council would intentionally seek an intensification of the use.

Allocating the site under Policy Econ 4 would shift the policy position significantly, provide strong policy support for the existing use and create the risk of the policy supporting the expansion of the existing use. The change would also create inconsistency with Policy Env 18 which does not support intensification of a use not associated with a countryside use. In addition, the Policy is intended to support business and industry uses within the urban area, and this alteration would result in support for such a use on a site in a rural location, creating the risk of setting a precedent for other similar proposals in other remote locations with poor accessibility by sustainable transport modes.

The Council considers the impact of the Plan's strategy with regard to the displacement of businesses is not as significant or extensive as alleged in the representation and its position is set out in further detail in its responses in Issue 3 Delivery of the Strategy. In addition, the proposed brownfield development sites identified within the Plan which currently have business uses on them are being promoted for mixed use housing led development and not just housing development, which is a fundamental part of the strategy.

The Council considers there is sufficient business and industrial land to meet Edinburgh requirements. The Plan continues to identify 1675ha of land for employment purposes across Edinburgh as shown in the Appendix to Issue 3 (CD144) through a range of sites in various locations. Although 46 ha of land has been taken up since the SDP was approved there is still 144.5ha of vacant employment land available for this type of development. The total land identified on the Plan Proposals map as 'Business and Industry Area', is approximately 483ha (CD144).

The Council acknowledges that there may be some businesses that have to relocate as a result of the redevelopment of brownfield sites such as class 5 developments which are not appropriate in a residential environment and the Council has identified additional vacant land (40.3ha) at Newbridge Industrial Estate in the form of an extension to the West. There is also 12ha of land still available within the existing Newbridge Industrial Estate that could accommodate relocating businesses. In addition there is existing Business and Industrial land identified at Brunstane (8.6ha) and Seafield, Site EW1d (26 ha) that could potentially accommodate some relocated businesses. This gives a total of approximately 87ha of land for potential industrial relocation. In contrast the total size of the existing 15 industrial/workshop sites identified for development in the Plan is just 22.4ha. As a result, the Council considers that the development plan does have a mitigation strategy for the impacts on businesses that are unable to be retained within redeveloped sites. As a result, the Council does not consider there is a need to identify further business and industrial land. The Council's position with regard to the use of compulsory purchase powers is set out in detail in its responses in Issue 3 Delivery of the Strategy, but in summary the Council considers the use of CPO is unlikely. **No modification proposed.**

#### Gibson Fitness Ltd (0122)

Pentland Gait is identified as an existing Business and Industrial Area on the Proposals Map. As a result, it is covered by Policy Econ 4 in the plan which seeks to retain these sites for business, industrial or storage development. Office development is supported on these sites and offices can also be found on other sites designated as Business and Industrial Areas, for example, the Sighthill Industrial Estate has a number of offices within it on Mid New Cultins. The purpose of Policy Econ 3 is to support office development

within designated centres or in other accessible mixed-use locations, where it can be demonstrated that designated centres are unavailable or unsuitable. It would be inappropriate to apply the Policy Econ 3 to Pentland Gait. Policy Econ 4 also seeks to prevent changes of use that would result in loss of business and industrial floorspace, an aspect of the policy that would not apply if the site was identified under Policy Econ3. As a result, the Council does not support an alteration as proposed. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

Policy Econ 4 applies to larger industrial areas and smaller industrial estates across the city which it seeks to retain for business and industrial uses. It is not intended that the policy be applied to small brownfield sites across the city. A key aspect of the Plan's strategy is to support the redevelopment of brownfield sites for mixed use housing led development and the plan has allocated a range of sites across the city in order to deliver this. This will help to bring forward new business and industrial units as part of housing development which will help to deliver 20 minute neighbourhoods. The Council is not convinced that allocating smaller brownfield sites under Policy Econ 4 will assist in preventing commuting as envisaged by the representor. **No modification proposed.**

Royal Mail Group Limited (0501)

Policy Econ 4 applies to larger industrial areas and smaller industrial estates across the city which it seeks to retain for business and industrial uses. It is not intended that the policy be applied to individual existing business sites across the city. The strategy of the Plan is to support sustainable growth of the city and meet net zero objectives. One of the aims (aim 2) of the plan to help achieve this is to direct new development to and maximised use of brownfield rather than greenfield land. Whilst the Royal Mail Group may need their existing sites for current business requirements, those requirements may change over the life-time of the plan. By identifying these sites for potential redevelopment for housing led mixed use development the plan is showing its support for future redevelopment of these sites should they become available. By identifying these sites as industrial sites under Policy Econ 4 the plan would restrict these sites against changes of use to mixed use housing led developments, which would sit at odds with the wider objectives of the plan. As a result, the Council does not consider it justified to identify these sites under Policy Econ4.

The Edinburgh West Delivery Office at 21 South Gyle Crescent is within the Edinburgh Park Business Centre and therefore is covered by Place policy 19. This policy seeks to maintain the strategic employment role of the area. The office is within area EP5 and it states in criterion d that this area should remain in predominantly business and industrial use. Therefore, the Council considers the policy position already supports the existing use and would not support the reuse of the delivery office for housing. **No modification proposed.**

The Royal London Mutual Insurance Society Ltd (0149)

The Plan has identified site H55 Seafeld for mixed use housing led development in accord with the aims of the plan to seek mixed use development across the city seeking to maximise the use of brownfield land. The Seafeld site is identified as a strategic site within the plan. Place Policy 15 states that a Place Brief will be prepared for this site and

that key stakeholders will be consulted as part of the process of preparing the brief. Place 15 sets out a series of development principles to guide development. Criterion a makes it clear that a mixed-use urban extension is being sought. The Council acknowledges the existing real estate within Royal London's ownership and considers that the redevelopment of the site provides the opportunity to incorporate such uses as part of the redevelopment. However, the Council considers that the redevelopment of the site and its master planning needs to be done in a comprehensive and wholistic manner. This will require consideration of the various existing uses, distribution of proposed uses, environmental constraints and the need for good placemaking and the importance of embedding 20 minute neighbourhood principles in order to achieve a cohesive place. Allocating the Royal London real estate under Econ 4 would prevent the reuse of that part of the site for residential development, which may not be the optimal arrangement for the site as a whole. Therefore, as a result, the Council does not consider identifying the existing Royal London real estate under Policy Econ 4 is desirable and it could compromise the overall redevelopment of the site. **No modification proposed.**

### **Policy Econ 5 Employment Sites and Premises**

Steve Loomes (0767), Barratt David Wilson Homes (0677), Homes for Scotland (0404)

The Council considers the Policy is entirely consistent with the strategy of the plan which seeks to redevelop brownfield sites for mixed use housing led development. Policy Econ 5 makes a specific reference to supporting mixed use development in criterion c. The Council considers the displacement of businesses is not as significant or extensive as alleged in representations and its position is set out in further detail in its responses in Issue 3 Delivery of the Strategy. **No modification proposed.**

Abrdn (0425)

Policy Econ 5 is an amended version of Policy Emp 9 in the adopted LDP. The policy has been amended so that proposals for a change of use are required to retain some business and commercial uses on all sites and not just those over 1ha. This is to ensure the policy is consistent with the overall strategy of the plan to seek to deliver mixed use development on all sites across the city as part of the process of delivering 20 minute walkable neighbourhoods. The Council considers the policy includes sufficient flexibility to allow residential only development where justified. Criterion c states that proposals should include floorspace for business and commercial uses "where appropriate in the context of the site and the urban environment". The policy sets out requirements. Any exception to this will be considered through the planning application process. Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101), allows for material considerations, including viability, to be considered on a case-by-case basis. Sites and proposals vary in nature and not all policies of the development plan will be applicable to each proposal. The requirements of the development plan should be taken into account in negotiations. Therefore, the Council does not consider it necessary to have a reference to viability information in the policy. **No modification proposed.**

Mr T Klan (0307)

The purpose of policy Econ 5 is to support development for employment purposes on existing business and industrial sites or to support changes of use on such sites in certain circumstances. Policy Econ 5 is intended to apply to urban areas only. Removing the reference to urban area would mean that if a planning application was submitted for the

change of use of an established industrial use to residential and the site was within the greenbelt or countryside area, then the policy would in principle support such a change. However, that would mean the policy would then be inconsistent with the requirements of Policy Env 18 Development in the Green Belt and Countryside. **No modification proposed.**

Melford Developments Ltd (0308)

The policy applies to existing business sites within the city that are not covered by Policy Econ 4 or allocated formally in the Plan. The Council considers the policy as written clearly articulates the requirements with regard to mixed use developments. **No modification proposed.**

Scottish Property Federation (0144)

The policy as written does not require all sites to be redeveloped for mixed use purposes. The first sentence of the policy states that planning permission will be supported for employment purposes on existing business or industrial sites i.e. it is supportive of retaining sites for these uses. The Council does not consider it pragmatic to seek a blanket protection of sites or existing uses. Market requirements change and existing real estate becomes out of date over time. **No modification proposed.**

It is only where proposals are being brought forward for changes of use that the Council is seeking mixed use development. In addition, criterion c has a caveat with regard to mixed uses which states “where appropriate in the context of the site and the urban environment”. As a result, the policy could allow alternative mono uses and there is an opportunity for developers to justify that on a case by case basis. Therefore, the Council does not consider the policy would threaten to remove key commercial sites from the city centre. **No modification proposed.**

Tarmac (0244), Hallam Land Management (0615)

Policy Econ 5 is an amended version of Policy Emp 9 in the adopted LDP (CD039). The Council considers removing the reference to “in the urban area” would have significant negative consequences for the reasons set out in its response to 0307. **No modification proposed.**

**Policy Econ 6 Hotel Development**

Cockburn Association (0777)

Policy Econ 6 sets out the Council’s position on hotel developments and Policy Econ 2 sets out the Council’s position with regard to mixed use development. Where a proposal for a hotel is being brought forward on a site larger than 0.25ha, developers should incorporate housing where compatible and appropriate in the context of the site. On smaller sites Policy Econ 2 would not apply. The Council considers that the policy requirements are clear. **No modification proposed.**

Cramond & Barnton Community Council (0243), Brian Tiplady (0641)

The Council commissioned consultants to prepare a review of the visitor accommodation sector when preparing the Plan (CD032). A reference to the study is included in paragraph 3.242. The study shows that despite a significant growth in hotel bedroom supply, the hotel market has performed exceptionally well, i.e. there has been a growth in demand that has taken advantage of the growth in supply. As a result of Covid, the consequences of which were felt after the study was published, there has been an impact on tourism. The Plan has acknowledged this in the supporting text in paragraph 3.243, however, the Council's expectation is that the impacts will fade over the next few years and the market will continue to grow. Therefore, the Council has updated the policy to support hotel development in designated centres (criterion c.) reflecting the fact that the opportunity for additional hotel development within the city centre is decreasing. Although the policy refers to hotels, it will apply to a range of different types of visitor accommodation. The policy does not cover short term holiday letting but the Council's position on this is covered by Policy Hou 7 Loss of Housing. **No modification proposed.**

#### Crosswind Developments Ltd (0184)

The boundary of West Edinburgh is shown on Map 25 within the plan and the Crosswinds site (H61) is within the boundary of West Edinburgh. The Council considers the plan needs to be read as a whole and that additional references to place policies within Policy Econ 6 is unnecessary. **No modification proposed.**

#### Living Streets Edinburgh Group (0486)

The Council considers the plan needs to be read as a whole. Policies with regard to parking are set out in the Infrastructure and Transport Policies section. Policies Inf 7-9. **No modification proposed.**

#### VisitScotland (0689)

Any proposal for a hotel would be covered by class 7 of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (CD105). It is not feasible to use planning policy to specify the type and quality of hotel that the strategy of the plan is seeking. **No modification proposed.**

#### Hallam Land Management (0615)

Policy Econ 6 sets out the Council's position with regard to hotel development. It applies within the boundaries of the airport, the Royal Highland Centre and West Edinburgh all of which are highly accessible by sustainable transport modes. It also applies to defined centres or accessible locations within the urban area. The policy seeks to support hotel development in highly accessible locations not rural locations. The proposed additional clause or removal of reference to "urban area" would introduce the risk of proposals being brought forward in remote locations with poor access to sustainable transport modes contrary to the aims of the policy. **No modification proposed.**

#### T Klan (0307)

The Council considers the policy applies to the urban area for the reasons set out in its response to 0615. **No modification proposed.**

#### Edinburgh World Heritage (0339)

The Council considers the plan needs to be read as whole. It is impractical to refer to the historic environment in numerous policies. The historic environment is covered in the Environment and Design policies section. **No modification proposed.**

#### **Policy Econ 7 Goods Distribution Hubs**

##### Juniper Green & Baberton Mains Community Council (0306), Archie Clark (0003)

The policy seeks to support goods distribution hubs in appropriate locations in Edinburgh. The policy does not specify that proposals are road or rail based. Therefore, the rail network could play a role in developing this. **No modification proposed.**

##### Leith Central Community Council (0614)

The Council considers the policy as written would be supportive of on street logistics hubs as it states that proposals for smaller sub- city scale neighbourhood goods distribution hubs will be supported provided they meet a number of criterion. It would not be appropriate for the policy to identify specific details as smooth pavements etc. The Council considers that criterion h. covers benefits to pedestrians through its reference to active travel. **No modification proposed.**

##### Hallam Land Management (0615) (Stuart Szylak)

The Council does not agree that there has been no real consideration of logistics and distribution hubs. Policy Econ 7 is a new policy and seeks to support logistics hubs within the urban area, or on relevant business and industrial areas with good accessibility. The Council does not consider rural locations such as Craigiehall as appropriate for a such a facility due to the lack of accessibility by sustainable transport modes. **No modification proposed.**

#### **Economy General**

##### Defence Infrastructure Organisation (0124)

Part 27 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (CD106) sets out a range of permitted development rights that apply to or on behalf of the Crown, and by extension the MOD. These rights allow the MOD to enhance or alter military sites for military purposes without planning consent. Where proposals for development are brought forward adjacent to military sites the Council will consider any potential conflicts as part of the process of considering the application. Where an existing military site such as Dreghorn barracks is located within the urban area the existing policies within the plan would be supportive in principle of the redevelopment of the site for appropriate alternative uses such as residential development should the military no longer require the site. In addition, the Council is willing to formally allocate military sites for redevelopment where the MOD considers sites are no longer required for their purposes and the site H367 Redford Barracks is an example of this. As a result, the Council does not consider there is justification for a specific policy within the plan that covers military sites or adjacent areas. **No modification proposed.**



#### LPBZ Commercial Ltd (0391)

The Council when preparing the Plan commissioned Consultants to prepare a Commercial Needs Study. This resulted in the publication of four papers covering the industrial market (CD035), the office market (CD034), retail and leisure (CD033), and visitor accommodation (CD032). In addition, the Council Commissioned Ryden to subsequently prepare a Mixed Use Delivery report (CD036) to update the 2018 Commercial Needs Study: Industrial Property Market report and to consider the impacts of Option 1 of Choices for City Plan 2030. Option 1 was to deliver all development within the urban area. The Council considers the findings of the report helpful for its purpose of understanding the overall implications of the Plan development strategy in terms of its impact on employment land. The Council's view is that the approach and policies set out in the Plan seek to minimise the loss of employment uses and is expected to have overall positive benefits overall compared to the existing policy position set out in the adopted LDP. The impacts of the specific developments on employment land will be considered at the time of proposals coming forward. For example, many businesses may be capable of being rehoused in smaller but more efficient units better suited to modern business needs. The Ryden report (CD036) points out on page 3 that "demand is strong for modern space, smaller units". In addition, some of the businesses may have already chosen to relocate and or existing units may be vacant, for example site H59 was allocated on the basis that the occupier had chosen to relocate. As a result, the Council does not agree that further detailed analysis of the impacts should be undertaken. The Council does not agree that it is possible to conclude at this time with any certainty there are going to be significant impacts of the development strategy on employment land. **No modification proposed.**

#### Lorraine Smith (0462)

Policy Econ 1 states that proposals for development associated with culture will be supported in principle. Paragraph 3.231 states that proposals relating to culture will be expected to be associated with relevant matters including the "Scottish Arts". As a result, the Council considers the plan takes cognisance of the Arts and seeks to support them as part of the development plan strategy. **No modification proposed.**

#### **Economy Table 13**

#### Royal Highland & Agricultural Society of Scotland (0482)

The Council acknowledges that the planning application referred to in Table 13 makes reference to "hotel(s)". The Council has no objection to a minor correction should the reporter/s be minded to alter the plan accordingly. Minor non-notifiable modification proposed.

The reference to the safeguarding of land at Norton Park for the long term relocation of the Royal Highland Centre is in the context of NPF3 as referred to in Place 20 Royal Highland Centre. The Plan must continue to safeguard this site until such time as this requirement is dropped by NPF4. **No modification proposed.**

#### Lynn Grattage (0362)

The reference in Table 13 to the NPF3 and West Edinburgh set out the factual position. A range of transport measures in West Edinburgh are identified within the plan in Table 8 to

address the traffic impacts as a result of development. The Plan, in Place Policy 16 requires development in West Edinburgh to accord with the West Edinburgh Development Principles, and master planning. This will set out the development requirements to mitigate any impacts associated with the airport. **No modification proposed.**

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 36</b>	<b>Commercial Development</b>			
<b>Development plan reference:</b>	Policy Econ 2 Commercial Development	<b>Reporter:</b>		
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>				
<table border="1"> <tr> <td> Ambassador Group (0683)  AREAA (0358)  Aviva Life and Pensions UK Limited (0598)  Barratt David Wilson Homes (0677)  Creos Property Limited (0253)  Crosswind Developments Ltd (0184)  Elgin Haymarket Limited (0292)  Forth Ports Limited (0496)  Lady Road Investment S.A.R.L. (0625),  LaSalle Investment Management (0262)  Lidl Great Britain Ltd (0181)  LPBZ Commercial Ltd (0391)  Melford Developments Ltd (0308)  Mr T Klan (0307) </td> <td> Parabola Edinburgh Limited (0723)  Scottish Property Federation (0144)  Shelborn Edinburgh Limited (0732)  Steve Loomes (0767)  The Institute of Chartered Accountants of Scotland (0182)  The Royal London Mutual Insurance Society Ltd (0149)  Tiger Developments Ltd (0602)  Unite Group PLC (0628)  University of Edinburgh (0464)  Watkins Jones Group (0516)  Wright PDL (0078) </td> </tr> </table>			Ambassador Group (0683) AREAA (0358) Aviva Life and Pensions UK Limited (0598) Barratt David Wilson Homes (0677) Creos Property Limited (0253) Crosswind Developments Ltd (0184) Elgin Haymarket Limited (0292) Forth Ports Limited (0496) Lady Road Investment S.A.R.L. (0625), LaSalle Investment Management (0262) Lidl Great Britain Ltd (0181) LPBZ Commercial Ltd (0391) Melford Developments Ltd (0308) Mr T Klan (0307)	Parabola Edinburgh Limited (0723) Scottish Property Federation (0144) Shelborn Edinburgh Limited (0732) Steve Loomes (0767) The Institute of Chartered Accountants of Scotland (0182) The Royal London Mutual Insurance Society Ltd (0149) Tiger Developments Ltd (0602) Unite Group PLC (0628) University of Edinburgh (0464) Watkins Jones Group (0516) Wright PDL (0078)
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<b>Provision of the development plan to which the issue relates:</b>	This policy sets out a requirement that proposals for commercial uses include a proportion of housing development.			
<b>Planning authority's summary of the representation(s):</b>				
<p><b>Policy Econ 2 Commercial Development</b></p> <p><u>Steve Loomes (0767), Barratt David Wilson Homes (0677)</u></p> <p>The Plan proposes to displace a significant number of active businesses so their current sites can be repurposed for housing development. This Policy gives those displaced businesses the additional problem of having to also ensure 50% of their new site is also used for housing development.</p> <p><u>Ambassador Group (0683)</u></p> <p>Delete policy for following reasons;</p> <ul style="list-style-type: none"> <li>• 50% requirement for housing would have significant viability implications on land uses other than residential housing.</li> <li>• The provision of facilities and services in commercial developments usually involve a number of fixed costs spread over a large number of units.</li> <li>• 50% requirement would significantly reduce floorspace that could be provided for commercial development because residential development has significantly more policy requirements than that of other uses, e.g. Hou3.</li> <li>• Lack of evidence as to why 0.25ha was chosen. It would be difficult to accommodate two use classes on a site of that size, that is before shape,</li> </ul>				

orientation and constraints to development are taken into consideration.

- Inefficient use of land. Proposals should seek to maximise density of development to sustainably accommodate the city's population. Therefore policy conflicts with Council's objective of maximising density and making efficient use of land.
- The negative impact from this policy would be exacerbated if residential housing demand dropped over the plan period as a result of an economic downturn. This would prevent other uses coming forward which could otherwise stimulate the economy and meet certain needs. In the current situation where the impact on the housing market from the COVID-19 lockdown is uncertain, policies need to be flexible so that there are not burdensome barriers in place which will stifle the economy.

#### AREAA (0358)

Delete policy for following reasons;

- There are inevitably instances where commercial uses may require a development footprint of 0.25ha or above and would seek a site sized accordingly. To introduce a requirement to develop 50% of that site for housing would at least double the site size required to accommodate the prospective development once the residential element was incorporated. When additional elements required by other LDP policies such as open space/gardens this might increase more.
- It would require commercial developers to deliver housing, either directly or with a development partner. In the case of the former it might be beyond their skillset and in the latter would introduce an unknown element and in turn risk to the commercial developer.
- No clarity is provided in relation to what might constitute incompatibility between uses and appropriateness within a site context. These would not be straightforward criteria to define. The result is uncertainty and a lack of clarity as to what would be policy compliant or what might be a departure from the development plan.

#### Aviva Life and Pensions UK Limited (0598)

Appreciate that housing is a fundamental need, and that the principle of the Proposed Policy is to assist in delivering the residential unit numbers required to meet predicated housing demand, Aviva submit that the Proposed Policy has the potential to inhibit investment to the city, as well as the provision of much needed commercial development uses.

To ensure that commercial investors continue to see Edinburgh as an attractive destination, and to assist in stimulating and sustaining the growth of the city economy, Aviva would encourage the Council not to apply a blanket approach such as that which is proposed by Policy Econ 2 and to continue to consider each commercial development opportunity on a site 0.25 Ha or greater on case by case basis.

If Policy Econ 2 is carried forward suggest that the Council caveat the Policy to state that viability information will be accepted, and will be a material consideration, when commercial proposals on sites 0.25 Ha or greater are assessed by the Council, if applicants can sufficiently demonstrate that they are financially unable to provide at least 50% of the site for housing.

#### Creos Property Limited (0253)

As Edinburgh recovers from the effects of the Covid-19 pandemic, the policy framework within the City Plan 2030 should play a key role in attracting further investment to the city, to assist in growing of the city economy, creating new job opportunities and will ultimately deliver successful, vibrant places. Therefore, encourage the Council to have a flexible and supportive policy approach in the Plan in relation to assessing proposals for commercial development.

Creos do not consider that all commercial development proposals on sites greater than 0.25 Ha should have to deliver at least 50% of the site for housing. Residential development will not always be compatible with commercial uses and Creos encourage the Council not to adopt the blanket policy approach as proposed by Policy Econ 2 into the City Plan 2030. Instead, suggest that the Council continue to consider commercial development proposals on sites 0.25 Ha or greater on a case-by-case basis. In order to create successful and attractive commercial developments, they are required to be complimented by high quality landscaping and public realm provision, which can include access, the creation of linkages to neighbouring developments and car and cycle parking. In addition, commercial developments are often supported by ancillary uses, such as food, drink and leisure offerings. Policy could inhibit investment to the city, as well as the provision of much needed commercial development.

Policy Econ 2, which restricts the quantum of commercial development that can be delivered on sites 0.25 Ha or greater, are potentially in conflict with, and undermine the principle of Policy Econ 6. The supporting text for the Policy Econ 6 notes the importance of hotels to the success of the city economy and to stimulating the growth of the tourism sector.

#### Crosswind Developments Ltd (0184)

The requirement to provide at least 50% of a site for housing on sites over 0.25 ha is an unreasonable request for developments and is likely unachievable. The site size threshold is too small and will render most developments unviable. This policy may be acceptable for Major Developments but it should be subject to a viability test. Whilst it is noted the policy states “where compatible and appropriate”, this is not significant enough flexibility.

#### Elgin Haymarket Limited (0292)

Object to the requirement to provide at least 50% housing on all proposals for commercial uses on sites greater than 0.25ha. This is a baseless reference and will encourage housing development in unsuitable locations across the city, at the expense of other more appropriate uses. The blanket approach proposed by this suggested policy wording will undermine, rather than facilitate, place-making and the wider Aims of the plan and its Spatial Strategy.

#### Forth Ports Limited (0496)

Revise approach supporting residential development as part of commercial development where the proposed land use, nature of development and site characteristics are compatible with residential development. Revised approach requires to ensure economic, community, public benefit and economic viability are considered. Approach should

exclude classes 5 and 6 proposals and recognise it would not be appropriate to apply to all locations including Port of Leith. Revise for the following reasons;

- No justification for setting a threshold of 0.25 ha to the application of the Policy. It takes no account of the proposed nature of the land use.
- Policy fails to recognise that residential development is not appropriate in a range of developments and has potential to stifle and prevent non-residential development.
- Policy and Glossary do not define 'commercial development.' Whilst examples are provided, it is unclear what uses it is expected to cover and is open to interpretation.
- It would be not appropriate to support such development within the Port of Leith as this would conflict with its statutory and legal obligations and duties.
- Policy does not take into account; location, character of area, character of site, wider economic/community/public benefits of commercial development, amenity considerations, impact of developer contributions.

Lady Road Investment S.A.R.L. (0625), LaSalle Investment Management (0262)

Encourage the Council not to apply a blanket approach and would suggest that the Council instead continue to consider each commercial development on a site 0.25 Ha or greater on case by case basis. Policy has the potential to inhibit investment, and provision of much needed commercial development uses. To ensure investors continue to see Edinburgh as an attractive destination and assisting growth of the economy suggest policy is not progressed. If policy taken forward encourage the Council to caveat the policy to state viability information will be accepted and will be a material consideration.

Lidl Great Britain Ltd (0181)

Delete policy for the following reasons;

- Policy is illogical and fails to recognise the realities of the development process. For example, if a site is 0.75ha is suitable for mixed residential and retail, and a single application is submitted and 0.35ha is for retail and the remainder for housing then the policy tests would be met. However, if the land is in two ownerships then it would be normal to submit two applications, and if that happened and one was only for retail for 0.35ha then it would fail the policy. No clear what is meant by "50% the site". Wording cannot address the scenario where site is used for ground floor retail and associated requirements with residential above. Correct approach is to set the mixed use requirement in development briefs and combine with a policy seeking mixed use communities.
- Policy fails to consider existing single use areas e.g. business parks. The redevelopment of any part of these sites would require residential development to be provided which would be bad planning. A residential use would conflict with adjoining uses and create a poor residential environment.

- Policy fails to provide a basis for interpreting the policy to the public and development industry. Policy states “where compatible and appropriate” which may appear to address the previous point, but the policy provides no basis to allow developers to determine the basis on which exceptions to the policy would be permitted. Essential that this is set out. One approach would be to identify on the proposals map where the policy would or would not apply, and where is does the factors relevant to consideration of the policy.
- Policy fails to recognise the crucial importance of non-residential land uses within the City. For Edinburgh to be a successful, thriving and sustainable city, it must promote and support the full range of other commercial uses. The effect of this policy is to promote residential development at the cost of these other types of development. If the Council insists on this approach it should be a policy that requires all development proposals (i.e. including residential) to provide a specified portion of land for different land uses and not a single use. In this way the policy would ensure that that the city is not dominated by residential which is, after all, the largest single mono-use present in the city. However, this is not a sensible approach. The correct approach is that any proposed development of a site of any size is to consider the land use context in which the proposal is located, the need for different types of use within the City (including both residential and commercial uses, as well as open space, community uses etc) and the benefits of providing mixed-use neighbourhoods to support sustainable communities. Draft Policy Econ 2 fails to do this.
- Policy will result in sterilisation of land, increasing vacancies and dereliction. One potential outcome is developers will acquire sites twice as large as required and not implement the proposed housing, which will have implications including driving down land values, creating areas of vacant land etc. The only development encouraged by this policy is residential and this will reduce the mixed character of the city i.e. the opposite of the stated aim.
- No evidence provided that supports the need for this policy or the aim of mixed uses cannot be achieved through more general policies and development briefs.
- The minimum area (0.25ha) is irrelevant and too low to the stated aim of the policy. A commercial development on a site as small as this will not have impact in adversely affecting the character of the surrounding area as a result of a “mono use”. If there is an intention to adopt a policy along the lines of Econ 2 the minimum size should be 0.75ha.

#### LPBZ Commercial Ltd (0391)

The threshold for Policy ECON2 is far too low and would suggest that either the site area is increased, or the percentage of housing required decreased in order to encourage investment and jobs within Edinburgh City’s boundary. For example, the former casino site at 2 Ocean Drive is 0.6ha in total so this site would meet the requirement to provide 50% housing if a commercial use was brought forward. This would not allow LPBZ to provide the quantum of space required within the constraints of other policies within the plan and therefore this location, which is also close to their other office buildings and



would assist the expansion of an existing business, would no longer be a viable option for LPBZ.

Plan does not include a definition of what is considered to be “Commercial Development”. This needs to be clarified in order to establish if office/business development is covered by Policy ECON2.

Melford Developments Ltd (0308)

Delete policy. If Council is confident it has sufficient housing land then this policy is not required. It is debatable whether the Planning Authority can influence land-use and commercial decisions in this way. Such a policy requirement is unrealistic for many sites / premises and will be unachievable. It is not clear where the threshold of 0.25 ha is derived or where the figure of 50% of the site for residential development comes from.

Mr T Klan (0307)

Add the following text to the policy ,‘within the urban area or on suitable greenfield sites ...’. There are many existing business premises not within the urban area. There will be many more enterprises or businesses that may want or need a more peripheral or out of centre location. This is particularly the case if the Council’s aspiration of relocating existing business and industry uses to facilitate brownfield housing development. This policy will restrict further the availability of employment land and premises, to the detriment of the economic growth of the city.

Parabola Edinburgh Limited (0723)

Parabola agree that housing is a fundamental need, and understand that the principle of Policy is to assist in delivering the residential unit numbers required to meet predicated housing demand. However, there is a concern that the Proposed Policy has the potential to inhibit investment to the city and it is suggested that the Council instead continue to consider each commercial development on a site 0.25 Ha or greater on case by case basis.

Scottish Property Federation (0144)

The council should also not be rigid in its approach to requiring housing as part of retail or leisure developments as proposed under Econ 2 and referred to in paragraph 3.176. The challenge of making such developments viable at all brings this policy into question. The Plan must focus on what is deliverable. Therefore the requirement for commercial developments above 0.25 h.a. should not have to provide affordable housing contributions. We would prefer any requirement for affordable housing contributions to be done on a selected basis, in discussion with potential commercial developers where the council believes there is a viable case for affordable housing contributions.

Policy does not recognise the impact of 50% housing, of which 35% must be affordable, will have on viability of commercial developments. Whilst the policy has a caveat, where compatible with the site, nevertheless consider it will be viewed negatively by investors. Policy has an extremely low threshold of 0.25ha which is little more than one or two floors in a traditional office block. It’s a blunt instrument and only City of Westminster Council has a similar policy. 50% requirement should be dropped. At the very least the threshold



must be significantly increased.

Shelborn Edinburgh Limited (0732)

Encourage the Council to have a flexible and supportive policy approach in the emerging City Plan 2030 in relation to assessing proposals for commercial development. Do not agree that all commercial development proposals on sites greater than 0.25 Ha should have to deliver at least 50% of the site for housing. Residential development will not always be compatible with commercial uses and therefore encourage the Council not to adopt the blanket policy approach as proposed by Policy Econ 2. Instead, suggest that the Council continue to consider commercial development proposals on sites 0.25 Ha or greater on a case-by-case basis.

To create successful and attractive commercial developments, high quality landscaping and public realm provision is required, which can include access, the creation of linkages to neighbouring developments and car and cycle parking. Often commercial developments also require supporting ancillary uses, such as food and drink or leisure offerings. The requirement for 50% residential may have potential to compromise the quality of commercial developments and provision of infrastructure/facilities required to create a sense of place. Policy could inhibit investment. Suggest policy is not progressed. If it is progressed request Council clarify what sites would be “compatible” and “appropriate” for housing and would encourage the Council to caveat the proposed Policy to state that viability information will be accepted, and will be a material consideration.

The interpretation of Policy Econ 2 in relation to Drummond House and the Younger Building also needs to be balanced against the requirements of Policy Econ 3. There is the potential for confusion as to which policy takes primacy in this instance, especially given the focus for office development in the strategic business centres.

The Institute of Chartered Accountants of Scotland (0182)

Appreciate that housing is a fundamental need, and that the principle of the Proposed Policy is to assist in delivering the residential unit numbers required to meet predicated housing demand, however, the Proposed Policy has the potential to inhibit investment to the city, as well as the provision of much needed commercial development uses. To ensure that commercial investors continue to see Edinburgh as an attractive destination, and assist in stimulating and sustaining the growth of the city economy, ICAS would encourage the Council to consider each commercial development on a site 0.25 Ha or greater on case by case basis, as opposed to applying a blanket approach such as that which is proposed by Policy Econ 2.

If Policy is carried forward into the City Plan 2030, alternatively suggest that the Council caveat the Proposed Policy to state that viability information will be accepted and will be a material consideration.

The Royal London Mutual Insurance Society Ltd (0149)

Delete policy and revise the approach which should be more flexible, supporting opportunities for residential development as part of commercial development proposals where, the proposed land use, nature and form of development, site characteristics including physical and environmental constraints and opportunities as well as the needs

for other land uses are compatible with residential development. The revised approach requires to ensure that economic, community and wider public benefit of the intended land use as well as economic viability to be considered. The approach should exclude proposals for development in Use Classes 5 and 6 and recognise that it will not be appropriate to apply the policy in all locations including in proximity to established business and industry areas, where its implementation would conflict these uses. The policy fails to recognise sufficiently that residential development is not appropriate in a range of developments and has potential to stifle non residential development. No definition of 'commercial development' in policy or glossary. Policy does not take into account a number of factors including; location, character of area, benefits of commercial development, amenity considerations, financial impact of developer contributions, change of use etc.

#### Tiger Developments Ltd (0602)

Delete policy. The Council should not to apply a blanket approach and would suggest that the Council instead continue to consider each commercial development on a site 0.25 Ha or greater on case by case basis. The Proposed Policy has the potential to inhibit investment to the city, as well as the provision of much needed commercial development uses. If policy taken forward alternatively encourage the Council to caveat the proposed Policy to state that viability information will be accepted and will be a material consideration when determining commercial proposals.

#### Unite Group PLC (0628)

Modify policy and supporting text add additional flexibility. Unite not adverse to principle of student schemes delivering market and affordable housing, however, this should only be required as part of larger development schemes and not a blanket approach to all sites above 0.25ha. No evidence supplied as to why threshold is 0.25ha. Do not believe a fixed site area is an appropriate way of achieving a mix of uses given the large variety of site specific criteria and constraints requiring consideration as part of any new development. Site size of 0.25ha is too small to deliver successful mix of student and residential development. PBSA developments also need to be of a sufficient scale to provide quality student welfare and amenity areas. Requiring a 50/50 split of student and residential on sites as small as 0.25ha would significantly impact upon the viability of student developments. A study prepared by Allan Murray Architects examining the difficulty of achieving a successful mixed student and residential scheme on sites of 0.25ha has been submitted.

Despite a requirement for 50/50 student/residential in the Council's Student Guidance since 2016 not aware of any developments coming forward which have delivered this on sites of 0.25ha. This requirement has also been questioned/set aside in a number of appeal decisions.

Subject to site circumstances sites of 0.5ha could be large enough for mixed student/residential schemes as evidenced by Iona Street and Abbeyhill examples. However, flexibility must be applied to these thresholds to reflect individual circumstances and where justified through the development management process. Desire to provide mainstream housing should not be at the expense of other housing types. Student housing plays an important role in meeting the city's housing needs, and this position is accepted in the English NPPF. In Edinburgh, a similar conclusion was reached in the

recent appeal decision at Gorgie Road (PPA-230-2298).

A higher percentage of student accommodation or even 100% should be permitted where there is clear evidence of student accommodation need. Where flexibility is applied to the 50% figure to allow a greater number of student beds, Unite would also be open to a scenario whereby the affordable housing provision was still calculated based on a 50/50 split to ensure there was no resultant loss in the delivery of affordable housing units to help the Council achieve its targets.

Finally, the wording of the Plan should also positively support a variety of ways that market and affordable housing could be delivered as part of mixed-use schemes.

#### University of Edinburgh (0464)

Do not support requirement for 50% housing as this conflicts with the University's ability to deliver purpose built student accommodation (PBSA) schemes at an affordable and deliverable level, and with a set target of a minimum of 200 units, as dictated within the University's Residential Strategy. Requirement would divert both financial and land resources away from the provision of learning, teaching and research. The requirement would also reduce the density of student accommodation that could be achieved on any given site, with the result being that the same quantity of student accommodation is required over a greater number of sites, making it more difficult to operate and maintain. The stated 0.25 hectares is a very small area to require 50% housing on and would result in a site where the student accommodation component would be too small to be operationally viable. 50:50 housing provision should not apply to university-led and delivered student accommodation on sites.

#### Watkins Jones Group (0516)

Supporting text of Policy Hou 6, notes that "larger sites provide an opportunity to balance the mix of land uses and to contribute to the delivery of housing. A mix of student accommodation and housing is required on all sites greater than 0.25Ha. Housing should comprise 50% of all student accommodation units. The affordable housing policy of 35% will apply. This will not apply in self-contained campus locations."

Policy Econ 2 also states that "proposals for commercial uses within the urban area on sites 0.25ha or larger, should where compatible and appropriate within the site context, provide at least 50% of the site for housing."

The supporting text of the policy notes that it applies to development for commercial uses including student housing, retail, leisure, hotels, and other commercial developments where they are compatible with residential use.

The WJG support the delivery of housing across Edinburgh, however, do not fully support the requirement for 50% mainstream housing on all sites. This should be considered on a case by case basis and should be informed by a number of factors including market demand for the accommodation in the given location, and proximity and accessibility by active travel to universities. In some locations, it may be better for most or all of developments to be for student accommodation. The stated 0.25 hectares is a very small area to require 50% housing on and could result in a site where the student accommodation component for example would be too small to be operationally viable.

Wright PDL (0078)

The Plan proposes to displace a significant number of active businesses so their current sites can be repurposed for housing development. This Policy gives those displaced businesses the additional headache of having to also ensure 50% of their new site is also used for housing development.

**Modifications sought by those submitting representations:**

Steve Loomes (0767), Barratt David Wilson Homes (0677), Elgin Haymarket Limited (0292)

No modification proposed. Council assumes respondent seeks deletion of policy.

Ambassador Group (0683), AREAA (358)

Delete Policy Econ 2.

Aviva Life and Pensions UK Limited (0598), Lady Road Investment S.A.R.L. (0625), LaSalle Investment Management (0262)

Modify policy to state that viability information will be accepted, and will be a material consideration, when commercial proposals on sites 0.25 Ha or greater are assessed by the Council, if applicants can sufficiently demonstrate that they are financially unable to provide at least 50% of the site for housing.

Creos Property Limited (0253)

If policy taken forward request that the Council further clarify what sites would be considered “compatible” and “appropriate” for housing and would encourage the Council to caveat the proposed Policy to state that viability information will be accepted and will be a material consideration when the Council determine commercial proposals on sites 0.25 Ha or greater.

Crosswind Developments Ltd (0184)

Policy should include a viability test.

Forth Ports Limited (0496)

Modify policy to ensure economic, community, public benefit and economic viability are considered. Approach should exclude classes 5 and 6 proposals and recognise it would not be appropriate to apply to all locations including Port of Leith. Also revise paragraph 2.93 to reflect revised approach.

Lidl Great Britain Ltd (0181)

Policy should be deleted. If there is an intention to adopt a policy along the lines of Econ 2 the minimum size should be 0.75ha.

LPBZ Commercial Ltd (0391)

Modify policy so that either the site area is increased, or the percentage of housing required decreased. Alternatively, LPBZ modify policy so an exception is included to allow an existing business to expand without the requirement to also provide on site housing where the site is under 1ha.

Melford Developments Ltd (0308)

Delete policy. If there is an intention to adopt a policy the modify to 0.30 ha and 25% depending on location and the individual case.

Mr T Klan (0307)

Modify policy to add the following text to the policy, 'within the urban area or on suitable greenfield sites ...'.

Parabola Edinburgh Limited (0723), The Institute of Chartered Accountants of Scotland (0181), Shelborn Edinburgh Limited (0732)

Modify policy to continue to consider each commercial development on a site 0.25 Ha or greater on case by case basis.

Scottish Property Federation (0144)

Policy should not require housing as part of retail or leisure developments. Housing developments within commercial developments above 0.25ha should not have to meet affordable housing contributions policy. They should be done on a selected basis where the Council believes there is a viable case for contributions.

Modify policy. 50% requirement should be dropped. At the very least the threshold must be significantly increased.

Delete policy. If it is progressed request Council clarify what sites would be "compatible" and "appropriate" for housing and encourage the Council to caveat the proposed Policy to state that viability information will be accepted, and will be a material consideration.

The Institute of Chartered Accountants of Scotland (0182), Tiger Developments Ltd (0602)

If Policy is carried forward into the City Plan 2030, policy should be caveated to state that viability information will be accepted and will be a material consideration when determining commercial proposals on sites 0.25 Ha or greater, if applicants can sufficiently demonstrate that they are financially unable to provide at least 50% of the site for housing.

The Royal London Mutual Insurance Society Ltd (0149)

Delete policy and revise the approach which should be more flexible, supporting opportunities for residential development as part of commercial development proposals where, the proposed land use, nature and form of development, site characteristics including physical and environmental constraints and opportunities as well as the needs

for other land uses are compatible with residential development. The approach should exclude proposals for development in Use Classes 5 and 6 and recognise that it will not be appropriate to apply the policy in all locations including in proximity to established business and industry areas, where its implementation would conflict these uses.

Unite Group PLC (0628)

Modify Policy to state: “proposals for commercial uses within the urban area on sites 0.5ha or larger, should where compatible and appropriate within the site context, provide approximately 50% of the site for housing”.

A new supporting paragraph should be added to state: “some flexibility to both the site threshold and percentage split of housing may be justified where required to reflect individual site considerations, design proposals and housing need. A variety of forms of housing delivery will be acceptable to satisfy this policy; in addition to traditional homes (built for sale) this will also include Build to Rent (BTR) and co-living developments.”

University of Edinburgh (0464)

50:50 housing provision should not apply to university-led and delivered student accommodation on sites.

Watkin Jones Group (0516),

Do not fully support the requirement for 50% mainstream housing on all sites. This should be considered on a case by case basis and should be informed by a number of factors including market demand for the accommodation in the given location, and proximity and accessibility by active travel to universities. In some locations, it may be better for most or all of developments to be for student accommodation. The stated 0.25 hectares is a very small area to require 50% housing.

Wright PDL (0078)

No modification identified.

**Summary of responses (including reasons) by planning authority:**

**Policy Econ 2 Commercial Development**

Steve Loomes (0767), Barratt David Wilson Homes (0677)

The Council considers that this statement is misleading for the reasons set out in its responses under Issue 3: Delivery of the Strategy. The Plan allocates sites for housing led mixed use development. The Council considers the plan must be read as a whole. The Council has identified land for displaced businesses within Business and Industrial land which is covered by Policy Econ 4 Business and Industry Areas. As a result Policy Econ 2 would not apply in those cases. **No modification proposed.**

Ambassador Group (0683)

The Council highlights that there are a number of responses which support the policy in principle. A key aim (aim 10) of the Plan strategy is to support mixed use housing led development. Numerous sites have been allocated across the city to meet this aim. Policy Econ 2 is entirely consistent with this aim and seeks to deliver some housing development alongside commercial uses where it is feasible to do so in the context of the site. The Council considers such an approach will help to deliver aim 1 of the Plan by supporting the delivery of 20 minute walkable neighbourhoods and mixed use walkable communities. The intention of the policy is to avoid mono use developments within the urban area.

The figures of 0.25ha and 50% were chosen to ensure consistency with the Council's Student Housing Guidance (CD048) as set out in criterion c) of the guidance, which similarly requires housing development alongside student housing on sites larger than 0.25ha. A cross reference to this is found in para 3.186 of the Plan. The Council sets out its position in relation to this in further detail in Issue 25: Student Accommodation. The Council considers that it is important that the plan sets out its aims and policies in a positive light making it clear what its intentions are, which is to deliver mixed use development across the city. Although there is the possibility of housing demand dropping, that is a relevant material consideration that can be taken into account at the planning application stage and therefore the Council does not consider it necessary to refer such an eventuality into the policy.

The Council does not consider Policy Econ 2 is in conflict with its aim to maximise density of development. The Council considers that through redevelopment of sites opportunities will be provided to create a more vertical mix of uses e.g. residential above commercial uses, and that there is scope to deliver development in a way that is more spatially optimised. **No modification proposed.**

#### AREAA (0358)

The Council considers the policy has sufficient flexibility within the wording of the policy as it states, "where compatible and appropriate within the site context". This will allow flexibility to allow some sites to be developed for single uses where it is not feasible to have a mix of uses. Compatibility will depend on numerous factors such as the size of the site, the mix and types of uses, and surrounding uses. The Council does not consider it necessary to set out further detail within the policy. Proposals will have to be considered on their own merits against the requirements of the policy. **No modification proposed.**

#### Aviva Life and Pensions UK Limited (0598)

The Council considers it is important that the plan seeks to pursue housing development across the city on all sites where it is appropriate and such an approach is consistent with the aims of the Plan. The Council considers such an approach will help to deliver aim 1 of the Plan by supporting the delivery of 20 minute walkable neighbourhoods and mixed use walkable communities. The Council considers the policy has sufficient flexibility as within the wording of the policy it states, "where compatible and appropriate within the site context". This will allow flexibility to allow some sites to be developed for single uses where it is not feasible to have a mix of uses. The policy sets out requirements. Any exception to this will be considered through the planning application process. Section 25 of the Town and Country Planning (Scotland) Act 1997 (CD101), allows for material considerations, including viability, to be considered on a case-by-case basis. Sites and proposals vary in nature and not all policies of the development plan will be applicable to each proposal. The requirements of the development plan should be taken into account in



negotiations. Therefore, The Council does not consider it necessary to have a reference to viability information in the policy. **No modification proposed.**

Creos Property Limited (0253)

The Council considers the policy has sufficient flexibility for the reasons set out in its response to 0598 above. The Council considers the Plan does have a supportive policy approach in relation to proposals for commercial development as it is seeking to directly influence the redevelopment of brownfield sites across the city to ensure a greater amount of mixed use development is delivered rather than leaving it to market trends which tends to result in mono use housing development. Further detail of the Council's position with regard to delivering mixed use development is set out in the Council's response in Issue 3 Delivery of the Strategy. The Council does not consider Policy Econ 2 is in conflict with Policy Econ 6, as the plan, its aims and policies need to be read as a whole. Furthermore, Policy Econ 6 has a reference to mixed use schemes potentially being required within the city centre. **No modification proposed.**

Crosswind Developments Ltd (0184)

The Council considers the policy has sufficient flexibility for the reasons set out in its response to 0598 above. **No modification proposed.**

Elgin Haymarket Limited (0292)

The Council considers the policy has sufficient flexibility for the reasons set out in its response to 0598 above. The rationale for the figures in the policy is set out in the Council's response to 0683 above. The Council considers the approach set out in Econ 2 is consistent with the strategy of the plan and will help to facilitate and the deliver the aims of the plan by supporting mixed use development throughout the city. **No modification proposed.**

Forth Ports Limited (0496)

The Council considers the policy has sufficient flexibility for the reasons set out in its response to 0598 above. The rationale for the figures in the policy is set out in the response to 0683 above. Examples of commercial development are set out in the supporting text in para 3.232. The reference to commercial development has been chosen to ensure the policy is flexible and future proof it against changes in the use classes order. **No modification proposed.**

Lady Road Investment S.A.R.L. (0625), LaSalle Investment Management (0262)

The Council considers the policy has sufficient flexibility for the reasons set out in its response to 0598 above. The rationale for the figures in the policy is set out in the Council's response to 0683 above. **No modification proposed.**

Lidl Great Britain Ltd (0181)

The Council considers the policy is logical and is consistent with the strategy of the plan to deliver mixed use development across the city. The Policy cannot be written to cover every possible scenario, such as a site in multiple ownership. Each proposal would have to be considered on its own merits with regard to the provisions of the policy. The Council



considers the policy has sufficient flexibility for the reasons set out in its response to 0598 above. The Council considers the policy is sufficiently flexible to address proposals for residential above retail. Furthermore, the Council considers the plan is supportive of vertical mix of uses as set out in its response to 0683 in the context of delivering high density development. The Council considers the policy seeks to support the reuse of single use business parks through mixed use development including residential and that the policy has sufficient flexibility to address issues with regard to conflicts with adjoining uses. The Council considers it impractical to identify where the policy should be applied across the Proposals map, as it cannot be predicted in advance where windfall sites will be brought forward for speculative development, nor does it consider it practical to identify a detailed list of exceptions in advance which will make the policy less flexible and more difficult to implement. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. **No modification proposed.**

The Council considers the Plan, its strategy and its policies recognise the importance of non-residential uses, which is one of the reasons why it is seeking to deliver mixed use development across the city. Historic trends have resulted in loss of employment land and commercial sites for mono use residential development as set out in the Council's responses to Issue 3 Delivery of the Strategy. The purpose of Policy Econ 2 is to ensure consistency in the strategy of the plan by seeking residential use as part of the development of commercial proposals "where compatible and appropriate within the site context". The Council considers such an approach will help to deliver aim 1 of the Plan by supporting the delivery of 20 minute walkable neighbourhoods and mixed use walkable communities. The Council does not agree that the policy will result in the negative outcomes e.g. sterilisation of land etc. The rationale for the figures used in the policy is set out in the Council response to 0683 above. **No modification proposed.**

#### LPBZ Commercial Ltd (0391)

The rationale for the figures used in the policy is set out in the Council response to 0683 above. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. The Council does not consider a definition for "Commercial Development" is necessary for the reasons set out in its response to 0496 above. Office/business development would be covered by the Policy. **No modification proposed.**

#### Melford Developments Ltd (0308)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. **No modification proposed.**

#### Mr T Klan (0307)

This policy has been prepared, in the context of the provisions of the Plan's strategy, to support and encourage mixed use development on sites within the urban area. By including a reference to greenfield sites there is a risk that the policy could be utilised to support greenfield development contrary to the Plan's strategy or other relevant policies resulting in inconsistency in the plan's policies. Therefore, the Council does not support such a modification. Points related to the relocation of businesses have been addressed in the Council's response to Issue 3 Delivery of the Strategy. **No modification proposed.**

Parabola Edinburgh Limited (0723)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. The Council does not consider the policy will have the potential to inhibit investment. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. **No modification proposed.**

Scottish Property Federation (0144)

Responses relating to CPO powers have been addressed in the Council's responses in Issue 3 Delivery of the Strategy. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. Affording housing requirements are dealt with under Issue 23. **No modification proposed.**

Shelborn Edinburgh Limited (0732)

The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. Proposals will be considered on a case by case basis against the requirements of the policy. Proposals for office use would have to meet the requirements of both Econ 2 and Econ 3. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. **No modification proposed.**

The Institute of Chartered Accountants of Scotland (0182)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. The Council does not consider the policy will have the potential to inhibit investment. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. **No modification proposed.**

The Royal London Mutual Insurance Society Ltd (0149)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. The Council does not consider a definition for "Commercial Development" is necessary for the reasons set out in its response to 0496 above. **No modification proposed.**

Tiger Developments Ltd (0602)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. The Council considers the policy has sufficient flexibility for the

reasons set out in the response to 0598 above. The Council does not consider the policy will have the potential to inhibit investment. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. **No modification proposed.**

Unite Group PLC (0628)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. Issues relating to viability have been addressed in the Council's response to 0598 above. The Council considers the plan is seeking to positively provide for market, affordable and student housing within Policies Hou2, Hou6 and Econ 2, and the overall strategy of the Plan. The Council position with regard to student housing is set out in its responses to Issue 25 Student Housing. **No modification proposed.**

University of Edinburgh (0464)

The purpose and justification for this policy and its provisions is set out in the Council's responses to 0683 above. The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers, including universities, to justify mono use developments where they consider mixed use development inappropriate or incompatible. The Council's strategy of seeking housing on sites proposed for student housing if they are larger than 0.25ha is not a new policy approach as set out in Criterion c of the finalised Student Housing Guidance (2016) (CD048) and referred to in Para 3.186 of the Plan. Policy Econ 2 of the Plan seeks to formally include this existing policy requirement in the guidance within the development plan. **No modification proposed.**

Watkins Jones Group (0516)

The Council considers the policy has sufficient flexibility for the reasons set out in the response to 0598 above. Proposals will be considered on a case by case basis against the requirements of the policy. It is open to developers to justify mono use developments where they consider mixed use development inappropriate or incompatible. **No modifications proposed.**

Wright PDL (0078)

The Council disagrees with these views for the reasons set out in the response to 0767 above. **No modification proposed.**

**Reporter's conclusions:**

<b>Reporter's recommendations:</b>

Issue 37	Economy Proposals	
Development plan reference:	Policies Econ1-7 and Table 13	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Crosswind Developments Ltd (0184) Edinburgh BioQuarter Partners (0478) Forth Ports Limited (0496) Mr T Klan (0307) LPBZ Commercial Ltd (0391) Lord Dalmeny (0475) NHS Lothian (0596)		
Provision of the development plan to which the issue relates:	These policies set out the development plan requirements in order to deliver the Plan's economy strategy.	
Planning authority's summary of the representation(s):		
<p><b>Economy Proposals</b></p> <p><u>Crosswind Developments Ltd (0184)</u></p> <p>Seek a modification to MAP1 and MAP2. The Crosswind development site (allocated site H61) in Map 2 is marked as Housing in an Area of Economic importance. Elsewhere in the proposed plan it also referred to as nationally important, mixed-use, housing-led and just as an Area of Economic Importance. The separate naming of the site is confusing, and the allocations are slightly contradictory. Therefore propose that marking the site mixed-use development is the most suitable and reflects the proposed plan's expectations for the site. This should be a consistent approach throughout the plan to ensure clarity around the site's allocation.</p> <p>There are no policies attributable to the designation an Area of Economic Importance. Table 13 states that supporting uses will still include significant opportunities for business however the policy position does not support this for the Crosswind site (H61). The Crosswind development site in Map 2 (Spatial Strategy) is marked as Housing in an Area of Economic importance and within Map 7 as "Housing as part of an Area of Economic Importance" but elsewhere in the plan it is referred to as housing-led development, mixed use development and as national importance. The proposed planning policy for Place 16 West Edinburgh , to which Map 7 relates, makes no reference to an Area of Economic Importance.</p> <p>These references are to a degree contradictory and it should have one fixed designation. A housing site would not be nationally important, nor would a housing site be suitable within an area of economic importance unless as part of a mixed use designation. CDL propose that marking the site mixed-use development is the most suitable and reflects the</p>		

proposed plan's expectations for the site. This should be a consistent approach throughout the plan to ensure clarity around the site's allocation. In addition, the Strategic Business Centre allocation should be extended to cover the CDOL site (H61).

#### Edinburgh BioQuarter Partners (0478)

Map 1 in the Plan defines BioQuarter as an 'Employment Centre' which compares to other employment centres defined in the Plan area at Leith Docks, Heriot-Watt University, Edinburgh Airport, and Newbridge. The EBQ Partners consider this definition, appearing on such a prominent Spatial Strategy map, is somewhat misleading in the context of the BioQuarter vision, which is "to rapidly grow the site into a new vibrant neighbourhood of Edinburgh centred around a world-leading community of healthcare innovators. By developing at scale and pace we will accelerate solutions to global health challenges". This vision, together with the nine Place Strategy Principles outlined demonstrate that BioQuarter is much more than an 'employment centre'. The vision is to transition BioQuarter from a science park with pavilions and green landscape to a high density, urbanised new neighbourhood. It seeks to build the critical mass to support a vibrant commercial environment, which will need a broad mix of uses in addition to the healthcare innovation accommodation, which collectively will create the vibrant Edinburgh neighbourhood.

In response to Choices, the EBQ Partners highlighted that Edinburgh BioQuarter is defined in the adopted LDP in a wide variety of sections and policies, including being defined as an 'Employment Centre' in Figure 1 of the LDP Spatial Strategy Summary Map (page 6). The Choices response states that "the EBQ should be included within an appropriate allocation to allow mixed use place making at the EBQ to be delivered. The allocation should be capable of delivering on the ambition for the EBQ as articulated in the Policy and Sustainability Committee approval for the site in February 2020, which sought 'the creation of a high quality, large scale sustainable development of the city, with zero net carbon ambitions' and 'additional new residential development, including a range of affordable housing' (para 4.10 of Policy and Sustainability Committee report, 25/2/20). The continued inclusion of Bioquarter as an 'Employment Centre' is a missed opportunity to reflect the BioQuarter vision and the nine Place Strategy Principles recently adopted by the EBQ Partners. Therefore the definition in the plan should be modified.

Map 2 of the spatial strategy refers to 'technical' allocations and refers to Edinburgh Bioquarter as 'Housing in Area of Economic Importance'. The EBQ Partners, again, do not consider this allocation to represent an accurate reflection of the emerging vision for Edinburgh BioQuarter, however, it is recognised the reference to an area of economic 'importance' is more generic than an economic 'centre', as referred to Map 1, and for the purposes of consistency across other areas identified for this reason in the city the EBQ Partners do not contest this allocation, nor its reference in the Housing-Led Development Map on page 27.

#### Forth Ports Limited (0496)

Identify Britannia Quay as 'Industry' / 'Employment Centre'. Identify Land South of Edinburgh Dock as 'Port of Leith Area with Potential for Change.'

FPL objected to the previous LDP which allocated these two sites for residential development and requested the land was designated for employment use. The Reporter

directed the Council to remove the housing allocations and proposed that the Council give consideration to designation of these areas for business and industry if this was appropriate during the next review of the Local Development Plan.

FPL in its response to the Choices for City Plan 2030 requested that its full estate, including these sites, should be identified for business and industry, whilst noting these areas have potential for change which may include residential development, student housing, hotel and leisure use. FPL have continued to restate their unchanged position since.

Britannia Quay will remain in port operational use and it is appropriate to identify the land for business and industry use which is commensurate with the remainder for FPL Scottish estates. Land South of Edinburgh Dock is highly likely to be released from the Port estate for development which is likely to include 700-800 houses, 12,400sqm of retail/commercial/business floor space and a hotel, however, if it does not come forward or does not get planning consent will continue to operate as an operational port.

Mr T Klan (0307)

Summerside, on Old Dalkeith Road potentially provides a useful sustainable location for employment, commercial and associated mixed uses.

There is as yet no evidence that less commercial / employment space will be required during the plan period as has been assumed in relation to West Edinburgh and Bio-Quarter where space has been substituted by homes. This is not consistent with the LDP strategy or vision.

LPBZ Commercial Ltd (0391)

A formal response was made to Choices for CP2030 requested that there was an opportunity for the car park area at 2 Ocean Drive to deliver mixed use development as part of a mixed use/office allocation in the draft City Plan. It was argued that the site is located within a highly accessible location and therefore would be suitable for high density residential and/or office development. Additionally, it was set out that the redevelopment of this site would result in the loss of a large car park which currently encourages the use of the private car and underutilises the development potential of the brownfield site within the urban area.

The Council has not taken onboard any of LPBZ's previous comments and the site has not been allocated for commercial led mixed-use development as requested. Office use appears to be excluded from the list of uses which fall within the Edinburgh Waterfront allocation and further sites for office potential (such as the site at Ocean Drive) have not been identified. Therefore, request that this allocation is modified to also include office development as a suitable use and to allocate the site for commercial-led mixed use development. No reasoning given for not including site. Disappointing given the highly sustainable location of the site (adjacent to a new tram stop). 83% of respondents (Choice 16- Delivering office, business and industry floorspace) agreed that other sustainable locations are appropriate for office use. Feedback relating to Choice 16 has been completely disregarded in the preparation of the proposed plan.

The final aim of the CP2030 states that modern business space will be delivered as part of “housing-led mixed-use development”. The policies contained in the plan do not allow for proposals for business use in isolation to come forward on sites located in mixed use areas, such as 2 Ocean Drive, despite the area being surrounded by housing uses so would very much be part of a wider housing-led mixed-use development. This aim is therefore flawed as it essentially states that small amounts of business space only will be permitted, and this can only come forward, if housing development is also proposed on site, without any consideration of existing surrounding uses. This aim should be reworded to say that business space will be permitted within mixed use areas.

The laudable planning aims of the Plan, are best achieved when the City Council and private sector work closely with one another, specifically with the private delivering the required development, with Council undertaking a facilitating role.

The objectives aim to create a community at the Waterfront and a community needs business land in order to be successful. As highlighted in previous representations and below in further detail, the business allocation for the Waterfront applies to an extremely small portion of land and has been carried over from the previous Local Development Plan (2016) without any review of the current use of this land (predominately residential). As one of the other aims will resist any change of use from housing to other uses, it is questioned as to how land in this area can possibly ever deliver economic land. In essence, the two aims contradict each other in relation to business land identified at the waterfront.

The current version of the plan does not encourage or promote business development on either existing or new sites within the urban area and actively encourages the change of use of existing business premises, even within Strategic Business Centres. In order for Edinburgh to continue to attract investment and provide jobs, within 20-minute neighbourhoods, the policies contained in this plan must allow for business development to come forward on a larger scale as part of mixed use proposals or within residential areas allocated for mixed use.

It is noted that the Proposed Plan begins with setting out a list of documents that support the policies outlined in the plan. LPBZ would like to highlight that this list does not include any specific note, assessment, appraisal or report relating to employment land in the city. As a Housing Technical Note is included in this list, LPBZ would question why there is not an equivalent for Employment land included. The plan appears to rely on a Commercial Needs Study dated November 2018. Without an up-to-date background document/supporting information available to back up employment and mixed-use policies in the plan, LPBZ would question whether these policies have been adequately evidenced and will stand up at examination.

#### Lord Dalmeny (0475)

Modify plan to allocate land to north of Lennymuir at Turnhouse road for business and mixed use offering-

CBRE's 2017 review of the industrial and logistics market in Edinburgh confirms that there is surprising little of this stock around West Edinburgh given its trunk road, rail, port and air access.



One such location is land to the north of Lennymuir at Turnhouse Road; the land is located adjacent to the eastern perimeter of Edinburgh Airport and has potential to assist in meeting the ambitions set out in National Planning Framework 3, and carried forward into the draft NPF4, to enhance the strategic role of Edinburgh Airport and increase the current business and mixed use offering.

Para 2.61 on page 22 of the Proposed Plan includes reference to the 'Countryside' policy designation and notes that it 'fulfils many of the same objectives as the green belt and where City Plan 2030 controls the types of development that will be allowed'.

However in this para, the Proposed Plan highlights that some of the boundaries of the Countryside designation have been altered for a number of reasons in the Proposed Plan, including both the addition and removal of several areas of land. Whilst most of the amendments reflect relatively insignificant strips of land, the Plan highlights the removal from the Countryside boundaries of a significant area of land to the south-west of Newbridge (north of the M8), comprising of approximately 44 hectares, which has instead been brought within the urban area and included as an extension to the settlement's Business and Industry Area.

We consider that the removal from the Countryside boundaries of this extensive area of land and its inclusion instead as part of the Newbridge Business and Industry Area sets a significant precedent for the Council to take similar action in other locations. In particular we highlight an immediate opportunity for the Council to take similar action in relation to a contained area of land, extending to approximately 4.6 ha to the north of Lennymuir at Turnhouse Road, that has potential to deliver significant benefit for in-demand employment land at this strategic location.

We therefore request that the text under para 2.6 be amended.

The Proposed Local Development Plan: City Plan 2030 ('City Plan') represents Edinburgh City Council's proposed vision for the Edinburgh City region up to 2032. As part of the preparation of the replacement plan, the proposed LDP presents the Council's settled view regarding policies, land allocations for employment, housing and commercial uses and other associated site allocations to meet the needs of the Edinburgh City region over the next 10 year period up to 2032.

We note that Para 2.61 on page 22 of the Proposed Plan includes reference to the 'Countryside' policy designation and indicates that it 'fulfils many of the same objectives as the green belt and where City Plan 2030 controls the types of development that will be allowed'.

However in this para, the Proposed Plan highlights that some of the boundaries of the Countryside designation have been altered for a number of reasons in the Proposed Plan, including both the addition and removal of several areas of land. Whilst most of the amendments reflect relatively insignificant strips of land, the Plan highlights the removal from the Countryside boundaries of a significant area of land to the south-west of Newbridge (north of the M8), comprising of approximately 44 hectares, which has instead been brought within the urban area and included as an extension to the settlement's Business and Industry Area.

The Council's reason for making this change are not expressly stated however the Environmental Report does confirm that some of the business and industry allocations carried over from the previous plan do not have consent and have therefore been subject to SEA; one of the sites is a new extension to the west of the existing Newbridge Industrial

site and, although it's a new allocation, it has been assessed together with the other industrial allocations for consistency.

We note that the Environmental Report prepared to accompany the Proposed City Plan, and which has informed which sites are taken forward for development, indicates that the Newbridge site is currently farm land and notes the following in relation to its characteristics:-

- There is a Local Nature Conservation Area adjacent to and within the site;
- There is ancient woodland within the site
- There is a watercourse adjacent to the site with potential for protected species to be within or adjacent to the site;
- The site is not brownfield;
- Part of the site is within a 1 in 200 year flood zone and there may be surface water flooding issues;
- The Strategic Flood Risk Assessment identifies the site as having a medium risk of fluvial flooding and a high risk of surface water flooding;
- The site is within the catchment area for a river or burn, where there is known to be engineered alterations to the river (considered in moderate condition by SEPA) and therefore development of the site may need to take into account the reduced resilience of this river with regard to surface water;
- The site does not have good public transport accessibility;
- The site is within 400m of designated open space;
- There is an A-listed structure (viaduct) adjacent to the site;
- The site occurs within an area of archaeological potential, in particular relating to prehistoric occupation, centred upon the River Almond valley;
- The site is within the countryside area not the green belt, and therefore has a neutral effect on the green belt;
- The site has an opportunity to contribute to the green network by being adjacent to a river corridor;
- The site does not have an impact on the landscape setting of the city but it has an effect on the characteristics of the landscape by changing it from agriculture to industrial, and it has some effects on local views in particular the landscape setting of features such as the railway viaduct and bings from the M8.

In spite of these constraints, the Environmental Report assessed the site as being an appropriate removal from the Countryside policy and appropriate for inclusion in an extension to the Business and Industry Area identified on land to the east at Newbridge. The Environmental Report suggested a series of appropriate actions to mitigate against any negative impacts of the proposed development; further detail is included in the supporting documentation submitted alongside this representation.

We consider that the removal from the Countryside boundaries of this extensive area of land and its inclusion instead as part of the Newbridge Business and Industry Area sets a significant precedent for the Council to take similar action in other locations. In particular we highlight land to the north of Lennymuir, at Turnhouse Road which we consider should also be removed from the Countryside policy designation in favour of being allocated for employment purposes. The extent of the land is identified in supporting documentation submitted alongside this representation.

Within the proposed City Plan 2030, the land to the north of Lennymuir at Turnhouse Road is identified as falling within the 'Countryside Policy Area' which will be carried forward to reflect the provisions of the adopted ELDP ENV10. Policy Env 18 Development in the

Green Belt and Countryside therefore currently remains the most relevant policy that applies to any future development on the land.

Under the currently proposed 'Countryside' designation the land at Lennymuir could only be developed for the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided that any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.

However, the land is located in a strategic position adjacent to the airfield boundary for Edinburgh Airport and is conveniently placed for development associated with and ancillary to the existing freight/cargo hub at Turnhouse Road. The land is identified in the Edinburgh Airport Masterplan as a location for future development for cargo operations and could equally facilitate other employment uses associated with the wider operation of Edinburgh Airport.

Development on land to the north of Lennymuir is not restricted by any physical or environmental constraints; rather the current impediment to development is the inclusion of the land by City of Edinburgh Council within the 'Countryside' policy area which would restrict development to uses for the purpose of agriculture, woodland and forestry, horticulture or countryside recreation or where a countryside location is essential.

In reality, and particularly given the backdrop of a busy airfield facilitating the operation of an international aviation hub, it is unlikely that any countryside uses would be appropriate to be developed here, both in terms of the nature of the experience of countryside users and also the potential for impact from countryside uses on the operational activities of Edinburgh Airport.

Furthermore, we suggest that any development of countryside uses on the site that might be considered appropriate in policy terms have the potential to prejudice the future growth of Edinburgh airport as they could remove an area of land that has been confirmed in the Airport Masterplan as being required for future expansion.

The land is not part of the Green Belt designation to the east and is distinctly separated from that area by the Fife railway line on its eastern boundary; we consider that the land has limited landscape value and development here would be unlikely to affect either the landscape setting of the city or the visual amenity of the green belt at this location.

However, with consideration for the receiving environment of the site and the aerodrome safeguarding limitations that would have the effect of restricting development of a number of the uses set out above, we consider that the land would lend itself better to an operational employment site rather than any form of countryside recreation as the potential for dust arising and bird attractant that could result from countryside recreation uses would likely render them inappropriate at a location in such close proximity to an operational runway.

We note that the key test for all proposals in the green belt and Countryside areas will be to ensure that the development does not detract from the landscape and/or rural environment of the area in terms of quality, characteristics and views. As the site is located adjacent to the operational airfield of Edinburgh Airport - which is urbanised in character, appearance and function - we do not consider that the site is of particular landscape or visual significance nor do we consider it to be of environmental importance.

We have undertaken an assessment of the land against the SEA themes used by the Council in reaching decisions as to the identification of land for development and highlight the following in relation to its characteristics:

- There are no SAC's, SPA's, SSSI's, Ramsar Sites or other features of environmental or ecological sensitivity on the site
- The proposals will create further employment opportunities
- The amount of Prime Agricultural Land that would be lost as a consequence of any future development on the site would be negligible
- There is no woodland ancient or otherwise on the site
- There is no watercourse present on the site
- Part of the site is within both a high and medium flood zone there may be river water flooding issues
- The site does have good public transport accessibility
- The site is within 100m of the designated green belt
- There are no historical or archaeological assets on or within close proximity to the site
- The site is within the countryside area not the green belt, and therefore has a neutral effect on the green belt
- The site does not have an impact on the landscape setting of the airport but it has an effect on the characteristics of the landscape by changing it from agriculture to industrial, however it is not anticipated that development of the site would result in a negative impact on landscape setting or character.

We highlight the following mitigation that suggested that the following would be appropriate actions to safeguard against any negative impacts of the proposed development:-

- A Preliminary Ecological Appraisal of the site should be undertaken and any subsequent protected species surveys carried out if appropriate
- The design and layout of this site will have to include greater attenuation than standard practice to reduce the risk of surface water flooding and its impacts
- A Flood Risk Assessment can be undertaken to investigate flood risk mitigation for the site
- The layout and design of the development should make appropriate linkages with the established access off Lennymuir
- A Design Strategy will be adopted for the site proposals to ensure no detrimental impact on the surrounding built environment
- A Transport Assessment can be undertaken to ensure no conflict in trip generation on Lennymuir and Turnhouse Road with consideration for current users and committed development in the area.

The land located immediately to the west and south west of the site is identified under the designation of Area of Economic Importance associated with Edinburgh Airport.

Policy Place 17 Edinburgh Airport of the proposed City Plan indicates that the development and enhancement of Edinburgh Airport will be supported within the airport boundary defined on the Proposals Map, and that the approved masterplan will inform this process. As the land at Lennymuir is identified for future development in the Airport Masterplan is it essential to include it within the boundaries for the airport as shown in the Proposed Plan.

We consider that there is no physical, environmental or operational impediment to extending the boundaries of the identified Area of Economic Importance to incorporate that land to the north of Lennymuir and to apply the provisions of Place Policy 17 to the land.

Within supporting documentation submitted alongside this representation, we include an assessment of the land at Lennymuir against the SEA themes used by City of Edinburgh Council to assess potential development sites before their inclusion in the City Plan 2030; we suggest that our assessment of the land at Lennymuir demonstrates that it would have less potential for environmental impact and would constitute a considerably smaller release of land than the large area reallocated from Countryside uses at Newbridge.

#### NHS Lothian (0596)

NHS Lothian are committed to improving their health and care facilities whenever and wherever they can, and remain committed to their three campuses in Edinburgh at the Royal Edinburgh Hospital, the Western General and the Royal Infirmary. The Royal Edinburgh Hospital will be the specialist acute mental health facility for the Lothian's, providing specialised learning disabilities and rehabilitation services. The Royal Infirmary will be south east Scotland's major unscheduled care centre, incorporating the major trauma centre and specialist neurosciences and children's services. NHS Lothian will also build and commence operating a new Princess Alexandra Eye Pavilion at the Royal Infirmary campus, to bring together all aspects of specialist eye treatment for the people of Lothian. The Western General will be south east Scotland's cancer centre, with breast, urology, colorectal surgical services on site and a new Cancer Centre is to be developed on the Western General Hospital campus. As the Council will appreciate NHS Lothian and other partnership organisations have other estates interests across the city.

The NHS Lothian estate strategy is under constant review to ensure it can appropriately respond to opportunities and challenges as they arrive. Moving forward, the NHS estate will require the provision of new buildings and facilities, but will also look to consider replacing and upgrading buildings. This approach by the NHS in regards to their estate is clearly reflected in a number of the proposed Place Based Policies, which relate to the redevelopment of a number of NHS sites.

Whilst opportunities may exist to develop existing premises for health, and health related development, opportunities may exist over the lifetime of the Proposed Plan to consider opportunities for the disposal of sites for alternative uses and forms of development. Flexibility on approach and in respect of uses would therefore be supported by NHS Lothian in respect of their existing estate interests.

In this respect NHS Lothian would welcome policy support from the CEC for the ongoing operation of their three primary campuses in Edinburgh into the future. NHS Lothian would request that the CEC consider including a policy within the Proposed Plan that supports both ongoing healthcare related development across the NHS Lothian estate, but support to deliver new development opportunities or uses that may arise. NHS Lothian would also suggest that this could take the form of a Place Based Policy, or as detailed within this representation, could include specific reference to the provision of healthcare facilities as part of the range of uses that noted under Policy Econ 1 Supporting Inclusive Growth, Innovation and Culture.

In terms of the Place Policies within the Proposed Plan NHS Lothian would request that any wording included in the emerging Development Principles relating to NHS sites does not constrain development related to the ongoing operation of the NHS.

## **Modifications sought by those submitting representations:**

### **Economy Proposals**

#### Crosswind Developments Ltd (0184)

Modify plan to drop reference to site H61 as an Area of Economic Importance and instead only identify site as a mixed use development.

#### Edinburgh BioQuarter Partners (0478)

Modify plan to alter reference to Edinburgh BioQuarter which should be defined as one of the 'Major New Development Area' designations under the term 'Edinburgh Bioquarter – Health Innovation-Led Mixed Use'.

#### Forth Ports Limited (0496)

Modify plan to Identify Britannia Quay as 'Industry' / 'Employment Centre' and Business and Industrial Use.

Modify plan to identify Land South of Edinburgh Dock as 'Port of Leith Area with Potential for Change.'

Modify plan to add the following text after paragraph 2.139 and before paragraph 2.140; "There is potential for land within the Port of Leith, located to the south of Edinburgh Dock to be released from Forth Ports' operational port estate. Potential exists for mixed use development which may include residential development, student housing, hotel, leisure, commercial, including retail and business uses. However if land is not released and/or subsequent Planning Permission for such development is not forthcoming land will continue in operational port and associated uses and business and industry uses commensurate with port operational use will be supported."

#### Mr T Klan (0307)

Modify plan to identify 'South East Edinburgh' as key economic area in Map on page 36.

#### LPBZ Commercial Ltd (0391)

Modify aim 10 to say that business space will be permitted within mixed use areas.

Modify allocation at 2 Ocean Drive to also include office development as a suitable use and to allocate the site for commercial-led mixed use development.

#### Lord Dalmeny (0475)

Modify plan to allocate land to north of Lennymuir at Turnhouse road for business and mixed use offering and remove it from the countryside policy area.

Modify text under para 2.6 to include the following additional bullet point:-

An area of land at Turnhouse Road, to the north of Lennymuir and located between the north-eastern boundary of Edinburgh Airport and the Fife railway line, has been removed

from the Countryside designation and is included as an extension to the Area of Economic Importance associated with Edinburgh Airport.

Modify the airport boundary to include Lennymuir.

NHS Lothian (0596)

Modify the Plan to introduce Place policies for the three primary health care campuses.

### **Summary of responses (including reasons) by planning authority:**

#### **Economy Proposals**

Crosswind Developments Ltd (0184)

The Council considers that the Plan should be read as a whole. Map 2 sets out the spatial strategy identifies the key aspects of the plan's strategy. However, it is diagrammatic and is not equivalent to the Proposals Map and therefore does not have the detail of the proposals map itself. The whole of West Edinburgh, Edinburgh Airport and the Royal Highland Centre is identified as an Area of Economic Importance. The Crosswinds site is one of a number of sites within West Edinburgh identified for housing led mixed use development, as elaborated in Place Policy 16 West Edinburgh. Although West Edinburgh is now identified for housing led mixed use development, the whole area still has an important economic role to play given its accessible strategic location to the airport, the rail network, and the tram. That is a key factor in envisaging the development of West Edinburgh as a mixed use urban extension. The Council considers the Plan manages to strike a balance between the strategy's different objectives for West Edinburgh.

The purpose of identifying West Edinburgh as an Area of Economic Importance is to highlight its continuing important role in the context of the Plan's economic strategy. Not all parts of Edinburgh have the same level of importance in economic terms. The Council does not consider there is a need for a specific policy within the plan to cover this area. West Edinburgh is in a transitory position (Table 13), from being an international business location as envisaged in NPF3 (CD097) to a housing led, mixed use urban extension in the context of draft NPF4 (CD099). The Plan seeks to capture the change in this emphasis. This is why it is important that the plan is read as a whole. Although Place 16 does not refer to the Area of Economic Importance it still states in paragraph 3.55 that the Plan continues to support economic development opportunities within West Edinburgh whilst introducing a balanced mix of uses that promote healthy, sustainable lifestyles and a strong sense of place through the 20-minute neighbourhood principle. The Council considers the policy position does support the development site H61 for opportunities for business. However, Place Policy 16 makes it clear under criterion o that a master plan will establish a mix of uses and identifies a list of uses including office, light and heavy industrial uses.

The strategic business centres are areas which are considered strategic office locations, and the plan identifies these in the context of policy Econ 3. These centres were previously identified in the adopted LDP (CD039). Policy Place 16 applies to H61. This policy sets out a series of development principles to guide development in West Edinburgh. Criterion o. states that master planning will establish how a mix of uses is

distributed across the area. It states that the mix will include offices. Therefore, the plan does support mixed use on H61, however, the distribution and mix of uses on the site will be determined through the master planning approach. The Council considers this is a pragmatic approach given the size of West Edinburgh and the importance of taking a holistic approach to its master planning. **No modification proposed.**

Edinburgh BioQuarter Partners (0478)

Map 1 of Plan sets out the Spatial Strategy of the plan in the form of a high level conceptual diagram. The areas shown as “employment centres” vary considerably in nature and the purpose of showing them is simply to show that they are major sources of employment, and not to imply that their roles are limited to employment only, for example, Heriot Watt campus is major location of education/training and student accommodation. The Council considers the plan needs to be read as a whole, and the revised vision for the BioQuarter is reflected in Policy Place 31 which identifies in the development principles that it will take the form of a high density urban extension, and will have a mix of uses including up to 2500 houses. The Council considers that the place policy is the most appropriate means by which the new vision of the BioQuarter can be articulated, rather than the spatial strategy map. **No modification proposed.**

Forth Ports Limited (0496)

The Britannia Quay site is identified on the Proposals Map as part of Central Leith Waterfront, and as a result Policy Econ 4 Business and Industry Areas already applies to this site. A specific reference is made to Leith Docks in this respect in paragraph 3.238. As a result, the Council does not consider it necessary to identify the site specifically as a Business and Industry Area as the policy position is already articulated in the plan. Furthermore, the Plan envisages the site an area of commercial and housing led mixed use development in the longer term as referred to in paragraph 3.17 of Policy Place 4.

The land south of Edinburgh dock as shown on the Proposals Map is partly within the Central Leith Waterfront, and therefore Place Policy 4 applies to that part of the site which supports housing development in the longer term. The north part of the site is within the North and Eastern docks as an area of industrial/business and port related use. It is also identified as an Area of Economic Importance. There is some ambiguity in the response as to the level of certainty of this site being brought forward for alternative uses and the types of uses, and therefore it is not clear what allocation is being sought. The Council is reluctant to formally allocate the site in the absence of greater certainty and clarity. In addition, any proposals for retail would have to be justified, in terms of being of an appropriate scale relative to the new demand generated, as the site is located outwith a designated centre, and retail development of an inappropriate scale could have a detrimental impact on designated centres. **No modification proposed.**

Mr T Klan (0307)

The Council does not consider there is a need to allocate further land for employment purposes for the reasons set out in its responses to Issue 3 Delivery of the Strategy. As a result, the Council does not consider there is a need to identify Summerside, which is in a greenfield location, for employment purposes. **No modification proposed.**

LPBZ Commercial Ltd (0391)



The site identified forms part of a larger legacy housing site from the previous adopted LDP, Central Leith Waterfront EW 1B, and is identified for 2,138 residential units (Table 2). Development proposals are expected to accord with the Edinburgh Waterfront Development Principles set out in policy Place 4. Edinburgh Waterfront is envisaged as an opportunity for mixed use regeneration on a large scale and has already started to help meet the city's growth needs particularly for new housing. The purpose of the policy is to ensure the regeneration of the waterfront is planned in a holistic manner in the context of a long-term vision. The policy also recognises that some parts of the waterfront will remain in business and industrial uses. The development principles for the Central Leith Waterfront states that any major office development should be within the strategic business centre. This is due in part to the level of accessibility of the SBC, which is adjacent to the tram terminus and its concentration of existing offices, in particular the Scottish Government. However, proposals for minor office development as part of a mixed-use housing development would be consistent with the requirements of the place policy and consistent with the overall mixed use strategy of the plan.

The Council considers the plan does encourage office development in Policy Econ 3. But it seeks to support it within designated centres and strategic business centres as these represent the most accessibility locations across the city. Within strategic business centres, as identified in paragraph 3.233, the Council expects office development to be a significant element of any mixed development reflecting their importance as major office locations. In other locations and within the new housing led mixed use allocations the Council is supportive of new business development in the context of delivering 20 minute neighbourhoods but the scale of business uses would be proportionate to the context of the site and the surrounding area. Proposals to redevelop existing business sites would be considered under policy Econ 5, and mono use is not precluded under criterion c "where appropriate in the context of the site and the urban environment".

The Council Commissioned Ryden to prepare the Mixed Use Delivery report (CD036) to update the 2018 Commercial Needs Study: Industrial Property Market report (CD035) and to consider the impacts of Option 1 of Choices for City Plan 2030. Option 1 was to deliver all development within the urban area. The Council considers the findings of the report helpful for its purpose of understanding the overall implications of the Plan development strategy in terms of its impact on employment land. The Council's view is that the approach and policies set out in the Plan seek to minimise the loss of employment uses and is expected to have positive benefits overall compared to the existing policy position set out in the adopted LDP. The impacts of the specific developments on employment land will be considered at the time of proposals coming forward. **No modification proposed.**

#### Lord Dalmeny (0475)

The Council does not consider there is a demonstrable need to identify land north of Lennymuir for business and mixed use for the reasons set out in its response in 0475 in Issue 3 Delivery of the Strategy. In addition, regardless of the lack of need for this site the Council does not consider the site at Lennymuir is an appropriate location for an industrial allocation and is not comparable with the extension to Newbridge Industrial Estate at Newbridge, which represents a natural extension to existing estate with good existing access to the strategic network. Lennymuir does not represent a sustainable location as it does not have good access by sustainable transport modes and development here is therefore likely to result in additional private vehicle trips. In addition, vehicle access to

Turnhouse Road via Maybury is poor at present, and development would increase the number of trips by heavy goods vehicles through this poor access point.

The safeguarded route for the Gogarburn diversion (Green Blue Network Proposal BGN49), passes along the western edge of the site and there is a risk that development of this site could prejudice this proposal. It also is located within an existing countryside area, and as a result is not a location where the Council would normally seek to support Industrial or business uses. The area forms a transition between landscape character areas. Whilst the site and its environs are not located within the Green Belt, they are influenced in part by the open, fragmented character of the airport, its runways and ancillary infrastructure immediately to its west, but are also associated with the relatively rural character along the flat and low-lying valley of the River Almond to the east of the rail line. It is separated from the main built up area at Maybury/Turnhouse Road by of Turnhouse Golf Course, Lennie Hill and Cammo Estate Park to the southeast. Beyond the junction with Turnhouse Road, Lennymuir narrows to become a minor, hedge-lined, rural road merging into Cammo Road, with settlement limited to small clusters of houses, cottages, farmsteads etc – so again relatively rural in character.

The site would be visible from the Edinburgh-Fife rail line which runs on an open section of embankment across the Almond and also from Burnshot Road and Craigie Hill to the north, where the existing ridge of Turnhouse Golf Course, Lennie Hill and Cammo Estate Park contains views the urban area to the south. Further development to the north of Turnhouse Road would be more visually intrusive from northerly viewpoints across the Almond valley but nearer to the site, development would be viewed in association with the Airport. As a result, the Council does not support the allocation of the site for business and industrial use.

The boundary of Edinburgh airport as shown on the proposals map is unchanged from the adopted LDP which was subject to examination and there has been no change in circumstances to justify a change. The airport master plan is not a planning document and therefore the Council considers this is not sufficient justification to change the boundary. In addition, it should be noted that the airport boundary shown in NPF3 (CD097), in the context of a national development on strategic airport enhancements (page 77), excludes Lennymuir. **No modification proposed.**

#### NHS Lothian (0596)

The Place policies in the Plan set out development principles to guide the development of brownfield and greenfield sites across the city. Where existing NHS assets have been identified as no longer being required for long term use for health services these sites have been allocated in the Plan and place policies prepared. The Council considers it unnecessary to prepare place policies for existing healthcare campuses which have not been identified as being surplus to requirements and will continue to provide healthcare services. Should that position change in the future, the Council will consider adding further NHS sites in subsequent Local Development Plans. **No modification proposed.**

#### **Reporter's conclusions:**

<b>Reporter's recommendations:</b>

Issue 38	Retail and Leisure	
Development plan reference:	Policies Re 1-11	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>AEW (0524) Ambassador Group (0683) Archie Clark (0003), Asda Stores Limited (0142) Avison Young for Aldi Stores Ltd. (0526) Brian Tiplady (0641) CBRE Global Investors (0644) Cockburn Association (0777) Crosswinds Development Ltd (0184) Edinburgh World Heritage (0339) Hallam Land Management (0615) Hazledene House Limited (0695) Inverdunning (Hatton Mains) Ltd (0427) Jamie Wallace (0167) Juniper Green &amp; Baberton Mains Community Council (0306)</div> <div>Leith Central Community Council (0614) Lidl Great Britain Ltd (0181) Living Streets Edinburgh Group (0486) New Town &amp; Broughton Community Council (0254) Nuveen Real Estate (0564) Peter Allen (0336) Robyn Kane (0091) Scottish Government - Planning and Architecture Division - Development Plans Team (0309) T Klan (0307) Tarmac (0244) Terry Levinthal (313) The Davidson's Mains and Silverknowes Association (0454)</div>		
Provision of the development plan to which the issue relates:	These policies set out the development plan requirements in order to deliver the Plan's retail strategy.	
Planning authority's summary of the representation(s):		
<div>Re 1 Town Centres First</div> <div>Leith Central Community Council (0614)</div> <div>The 2,500sq.m. threshold seems huge in comparison to the scale of retail units in Leith. This threshold should be significantly lowered and demonstrate that proposed large retails won't have a significant adverse effect on the vitality and viability of existing retails.</div> <div>Any Retail Impact Analysis should clearly look at wider impacts on the Community. Opening hours and delivery schedules should be part of any large retail application to minimise any negative impact on nearby residents.</div> <div>Crosswinds Development Ltd (0184)</div> <div>CDL seek a modification to Policy to ensure the wording of this policy helps achieve the Council's aim of securing 20-minute neighbourhoods.</div> <div>In addition, request that all new proposed town/local centres are included in Table 14 under the relevant heading so that policies such as this will apply to these development</div>		

sites. Currently Table 14 just notes West Edinburgh as a “new centre”. It is clear from the Place Policy 16 and Map 24 that there is to be a local centre located within the H61 and this must be reflected in Table 14. Without the clarification that these are new town/local centres are include the application of policies such as this are brought into question.

## **Re 2 City Centre Retail Core**

### Hazledene House Limited (0695)

Acknowledge that the purpose of this policy is to indicate the circumstances in which retail floorspace in the City Centre retail core will be supported. Notwithstanding this, a new and innovative approach to the future role of City Centre Retail Core should be adopted which takes both the changing nature of retail and significantly lower demand for shops into account.

### Edinburgh World Heritage (0339)

Support the principle and many details of this policy. However, note that given national and local trends regarding localised areas of retail decline, there is opportunity for more residential and cultural uses in the defined retail core. Therefore modify the policy so that this principle is integrated either into this policy or elsewhere as appropriate within the plan.

## **Re 3 Town Centres**

### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Under criterion a) the policy states that “there will be no significant adverse effects on the vitality and viability of the city centre retail core or any other town centre”, this must mean that for town centres to maintain their vitality, viability and deliver good placemaking, they will require banking facilities beyond a cashline machine and/or a post office.

Juniper Green, Currie and Balerno – a very significant population – have no or virtually no such provision. Without these facilities, people go to where there is a bank and do their shopping there (a ‘linked trip’) – a substantial loss to their own community. Small shops do not always have card reader facilities which means they too suffer. As a result this militates against the establishment of local shops and has an impact on community activities (jumble sales, sales of work, etc.) that involve the exchange of small sums of money. Thus the attraction of 20-minute neighbourhoods proposed in these Plans may not be seen as meeting the needs of people who must leave their community to buy a light bulb. Banking and Postal provision must be regarded as part of the essential infrastructure of town centres.

The town centres listed in 3.250 should include reference to the needs of these communities mentioned above by the following amendment to this para: “../Tollcross, Juniper Green/Currie/Balerno.”

It is not clear why other ‘town centres’ at Chesser and Wester Hailes, for example, are not covered by this policy.

The Glossary definition of “Active frontage should be defined at “street door access”.

#### Juniper Green & Baberton Mains Community Council (0306)

The Town Centres and Local Centres featured in the map on page 37 show the lack of facilities to meet 20- minute neighbourhood requirements: many specialist shops are spread around the boundaries of the city and so require a car or protracted bus journey (or journeys) to reach them. The viability of shops may be affected by the need to provision them, a lack of free or cheap parking in the right area, or the deterrent effect of an LEZ. Juniper Green and Baberton Mains currently has about 20 retail units of varying size; in 1964, there were about 30 but, as the bank, Post Office and St Cuthbert's have gone, people leave the area to shop elsewhere, which means that there is less incentive for someone to open a shop locally. It is also clear that the large new housing estates in e.g. Balerno do not have facilities within them, so the 20-minute neighbourhood concept does not exist there unless CEC were to acquire and convert housing units.

#### Peter Allen (0336)

Given the focus on 20-minute neighbourhoods I would like to add the principle of linking together town centres (e.g. Portobello to Leith, through Seafield) to make it easier for people to access the facilities they need without using a car, and to increase retail activity along connecting routes.

Town centres (e.g. Portobello) are often cited as prime examples of 20-minute neighbourhoods. We therefore need more of them and to link them together to create "corridors" between thriving neighbourhoods.

#### The Davidson's Mains and Silverknowes Association (0454)

Welcome support for the recognition of Stockbridge and Corstorphine as town centres. Should be seen as an alternative to the main city centre and be readily accessible by public transport from the wider area. Policies should be introduced to promote and develop these including better local transport links.

### **Re 4 Alternative Use of Shop Units in the City Centre and Town Centres**

#### Hazledene House Limited (0695)

New and innovative approaches towards uses within the City Centre Retail Core should be considered. The city centre planning guidance referred to at Policy Re 4 requires to be updated to address the future role of Princes Street. Support in principle, however, the city centre planning guidance referred to at Policy Re 4 requires to be updated to address the future role of Princes Street, particularly its western end, given the high number of vacant units. New and innovative approaches towards uses on Princes Street should be considered. The city centre planning guidance should seek to address:

- The future role of Princes Street and the level of vacancies at all floors. The nature of retail is changing and there is now significantly less demand for shops and large, traditional style department stores. This trend has been accelerated by the Covid-19 pandemic and is clearly illustrated in Edinburgh by the recent closures of a number of shops and department stores on Princes Street;
- The shift of the focus of retail within Edinburgh away from Princes Street to the Eastern

End of the City Centre and the new St James Centre. The City Centre Retail Core has become fragmented as the main retail focus is now located in the eastern end of the City Centre and the policy must recognise this;

- Each case must be considered on its own merits and the policy should take into account the demand for retail units, particularly within the west end of the City Centre Retail Core; and
- Underutilised floorspace at upper floors on both Princes Street and its immediate, surrounding streets.

## **Re 5 Local Centres**

### Archie Clark (0003)

Table 14. The first two are City Centre (1) and Town Centres (8), the nearest to Juniper Green being Gorgie/Dalry. There are 63 Local Centres of varying sizes including Main Street Balerno, Juniper Green, Pentland View Court Currie, Bryce Road Currie, Corslet Place, Colinton as well as Chesser, and Wester Hailes. Local Centres are described in the Glossary as generally of 10 or more units although "In some instances, centres of less than 10 units have been included in order to provide a local centre within 15 minutes walk of residents." There are 7 Commercial Centres which include Hermiston Gait and The Gyle on the west of the City.

The wide variety in size of local centres is not reflected in how they are described. Some have banks and/or Post Offices, others have no such facilities and is the objective not to make them within 10 minutes' walk of home.

The plan should include local provisions including a museum and local council offices in central Currie so landward communities do not have to trek into town.

### Asda Stores Limited (0142)

Asda Stores Limited are a national multiple grocery retailer, with approximately 650 stores employing approximately 165,000 colleagues across our stores, logistics, industrial and administration businesses. They serve approximately 18 million customers on a weekly basis. Within the Edinburgh City Council area there are three stores and these all provide their respective communities with key services and facilities. The stores at Chesser and The Jewel are acknowledged as part of the retail hierarchy of the City through their continued allocation within Local and Commercial Centres respectively.

The store at Leith was established in 2009 as part of the Western Harbour Master Plan area. The currently adopted Local Development Plan shows the Asda site forming part of Edinburgh Waterfront: Leith Western Harbour (EW 1a) and also allocates the area as 'Indicative Shopping Proposal Leith Waterfront – Western Harbour' where policy S3 is applicable.

Table 8 of the LDP confirms the following:

"S3 - Leith Waterfront - Creation of a new local centre - The approved master plan and framework propose a new local centre as part of the overall regeneration of the area. This

has been part implemented by a superstore at Sandpiper Drive"

As such the site is identified as a Local Centre where additional retail and facilities are supported by Policy Ret 1 'Town Centres First'.

The Proposed Plan no longer acknowledges this role. The site is still within the Edinburgh Waterfront area but there is no mention of the Centre allocation. Asda consider that there is merit in identifying a Local Centre at this location. The store provides facilities for the local community – food and non-food retailing, petrol station, café, opticians, barbers and Timpsons. The continued allocation of the site as a Local Centre would acknowledge the role that the store plays in the local community and would encourage other local services to locate in the area, in line with the aspirations of the National Planning Framework.

#### Crosswind Development Ltd (0184)

Object to Policy Re 5 and seek confirmation that the centre noted within Crosswind (H61) will be a local centre. Map 24, as part of Place 16, marks both the area in site H61 as well as H63 as a town/local centre. In addition, Part 4, Table 14 lists West Edinburgh as a "Proposed New Centre" which does not provide clarity. The supporting text of Policy Re 5 at paragraph 3.256 states that "this policy applies to the local centres listed in Part 4, Table 14". If the plan was not amended this would preclude H61 from accommodating any retail development.

It is clear from the Place Policy 17 and Map 24 that there is an intention for a town/locale centre to be located within the H61 Crosswind site however the imprecise wording as currently set out in Table 14 does not make this ambition clear. CDL request that this table is amended to make it clear which is which, e.g. Town Centre at IBG and a local Centre at Crosswind as there are different local plan policies for both town and local centres.

Table 14 should be amended to include explicitly that a new local centre is proposed at CDL's site (H61) as illustrated on Map 24 and that another town centre is proposed at IBG (H63). This is important because without this status certain uses will be precluded from these new communities by other policies of the plan.

#### Tarmac (0244)

The plan identifies a hierarchy of shopping and leisure provision including 63 local centres. Local Centres across the city and some new centres are proposed in connection with new development (Part 4, Table 14). A local centre or hub is proposed as part of the Bairdview development plans. As acknowledged by the Council, these contribute to the quality of life and sense of identity of neighbourhoods. The Plan, in line with Scottish Planning Policy, continues to support the existing network of city, town and local centres in locations such as Ratho. Local Centres are important focal points for communities in the city providing community facilities in accessible locations. At present Ratho is underrepresented in terms of a whole range of social, community, leisure and commercial facilities and this will not change over the Plan period unless investment is supported and encouraged.

Therefore, policy should be modified to include a new clause. The Bairdview proposal has the potential to provide a defined local centre as part of a community hub in Ratho with space for retail, service and community facilities to serve the whole of Ratho, which will reduce convenience and service trips to remote centres, e.g. the Gyle, which would be a sustainability benefit with no adverse effect on other centres.



#### T Klan (0307)

The plan should Identify 'South East Edinburgh' as proposed new Local Centre.

Policy Re5 as phrased is misleading as it primarily relates to retail development within existing centres as opposed to the formation of a mixed-use local centre, therefore propose modifying text of policy.

#### Inverdunning (Hatton Mains) Ltd (0427)

Add new local centre at Hatton Village. The Inverdunning proposal for a new sustainable community at Hatton Village were outlined in representations to the Choices document. A summary of the case for Hatton Village and how it meets City Plan aspirations for 20 minute new neighbourhoods with strong public transport linkage is outlined in the supporting document.

#### The Davidson's Mains and Silverknowes Association (0454)

The shops at Silverknowes Road should be added to the list. There are many of a similar size or smaller listed. It is an omission which should be corrected. Support the recognition Davidson's Mains as one of 65 local centres across the city. This is seen as important in the context of development and future funding for the 20 minute neighbourhood strategy . Historical village centres have declined in importance over past decades but their reinvigoration to provide a full range of local facilities is going to be essential if the Council are going to achieve other policies in relation to the promotion of active travel, reduced car usage and reductions in pollution. The village centre will require funding for place making to enhance the environment and make it more attractive for shoppers and pedestrians.

It is a criticism of the Plan that it is very weak on how 20 minute neighbourhoods will be promoted and enhanced in mature localities , in contrast with the clear policy in relation to new developments.

#### AEW (0524)

Modify wording of policy. There is no reference to the potential for larger scale regeneration or redevelopment proposals referenced in Policy Re 5 Local Centres. This is a backward looking policy and does not reflect wider place based priorities promoted elsewhere in the plan.

Retail centres are under increased pressure and stress. Trends have been accentuated by the recent Covid pandemic but many deep rooted structural issues have resulted in long term decline in many retail sectors. A more holistic, pragmatic and flexible approach is therefore required and the terms of Re 5 require to reflect this.

City Centres: Past, Present and Future states that 'councils require to take a holistic approach to regenerating centres ....instead of trying to replace failed shops with more retail, investors and policy makers should focus on making centres attractive places to do business and spend leisure time – not just to shop'.

British High Streets: from Crisis to Recovery, recognises that structural changes have been taking place on British high streets since the late 19th/early 20th Century, and were highlighted by the global recession, successful high streets happen where 'new forms of complementary relationships' exist. In particular between retail spaces and spaces for service provision leisure and social interaction – where high streets become destinations and not just for shopping. Providing opportunities for social interaction and also creating a more vibrant night time economy.

Successful town centres – Developing effective strategies states that town centres need to re-position themselves to re-claim their rightful position and role as places that serve communities, visitors, businesses and key stakeholders with a quality of experience that encourages them to keep coming back and staying longer.

Retail is not necessarily any longer a dominant feature of successful town centres which now need to offer a mix of uses for work, play, visit and shop. Supporting town centre economies requires a holistic approach encompassing daytime, evening and night time uses.

The trends in local centres is exactly the same. The issues faced are more pressing in marginal locations where retailer demand is diminished and basic economies and viability impact on the day to day operation.

At a local level, growth can be maximised through changing the perception of a place. Defining the sense of place is key.

Wester Hailes Local Centre is clearly in need of investment and a more comprehensive and holistic approach is required to regenerate it as well as the surrounding area. The existing policy will not achieve that.

The Proposals Map simply defines the extent of the Wester Hailes centre and does not reflect the wider regeneration projects within Wester Hailes. The Neighbourhood Plan, other masterplan initiatives and community partnership projects should inform a more cohesive and positive response to the Wester Hailes Local Centre to provide a positive framework and policy response for regeneration.

A specific and additional Place Based Policy is promoted and should be considered to encourage a wider regeneration framework for a new Town centre for Wester Hailes based on the existing Westside Plaza and extending across Murrayburn Road to the Union Canal. This should embrace a similar policy response to the Gyle Shopping Centre and should recognise the local place based initiatives across the wider Wester Hailes area and the potential redevelopment opportunities to re-imagine Westside Plaza as a new town centre and to encourage housing-led redevelopment opportunities.

#### Avison Young for Aldi Stores Ltd. (0526)

We consider that the Aldi store at Dock Street, should form part of a future established Local Centre. It is unclear why, given the mix of provision within the area, comprising shops, restaurants and bars, has no policy protection and consider this should be addressed by the emerging Plan. We consider that the mix of uses present is consistent with the characteristics described within Scottish Planning Policy for identifying these areas. A suggested centre boundary is included with these representations.

### Hallam Land Management (0615)

Modify the wording of the policy, alter the definition of a local centre in the Glossary and amend Table 14 to include Craigiehall as a proposed local centre.

A new Local Centre is proposed as part of the community hub at Craigiehall. It is a suitable location and will become available for retail, community and commercial uses. The site will be an accessible high – quality designed development which will be a vibrant location giving a sense of place. It will be designed to safeguard local residential amenity.

Policy Re5 as phrased is misleading as it primarily relates to retail development within existing centres as opposed to the formation of a mixed-use local centre.

It is planned to include retail development to serve the whole neighbourhood and reduce convenience shopping trips to more remote centres in Davidson Mains, Cramond, Kirkliston and South Queensferry. This would be a major sustainability benefit for the neighbourhood and easily accessible by walking or cycling from nearby residential areas without any current provision.

Retail development would be integrated into the centre and is compatible with the function and character of the development potentially utilising existing buildings. There would be no adverse effect on other centres and there would be a clear need for convenience retail provision to serve the local catchment. As acknowledged by the Council, these hubs contribute to the quality of life and sense of identity of neighbourhoods and will assist in meeting current deficiencies within this part of the city.

Policy Re 10 deals with the potential for Entertainment, Leisure and Café /Restaurant developments and states Local Centres are a preferred location for such uses. But this is inconsistent with the Local Centres Policy Re 5 which bases its assessment on the quantum of retail, as opposed to an evaluation of all other options in a sequential test approach. This is likely to prove problematic in determining planning applications.

### **Supporting responses**

#### Terry Levinthal (313)

### **Re 6 Commercial Centres**

#### Robyn Kane (0091)

The current plan to build a cinema at Cameron Toll is a bad plan. It is not needed in the area as there is one at Fort Kinnaird retail park and it would cause a huge disturbance to locals. The current plan also greatly effects Liberton tennis club as it would stop emergency vehicles getting access to the club and this would result in the club having to close down. Putting a cinema on the site would also remove essential parking to the site that has already been cut because of other retail stores being added to the car park.

#### Nuveen Real Estate (0564)

Policy Re 6 should include a similar criterion to Policy Re 2, in requiring proposals to provide high quality, commercially attractive units to a high standard of design, that improve the appearance of the commercial centre.

Modify Table 14 by amending reference to Craighleith Retail Park to reflect planning applications that have been submitted and will be determined in due course.

Whilst supporting the aspiration of Policy Re 2, in particular in relation to criterion 'a' which seeks to raise the standard of commercial units being brought forward in the city centre retail core, are concerned that there is not an equivalent requirement for Commercial Centres in Policy Re 6. As is well known, city centres are particularly vulnerable to competition from retail and leisure development in out of centre and commercial centre locations which aren't restricted in terms of, for example, unit design, or, to the same extent, in relation to car parking provision. Placing a similar requirement in Policy Re 6 would move towards levelling the playing field in this regard.

General provisions with Policy Re 6 with respect to new retail uses are accepted. However, propose the insertion of the following sentence: "In addition to retail use, proposals for entertainment, leisure and café/restaurant, hotel, offices and housing are acceptable in principle at Commercial Centre locations subject to demonstrating compliance with other City Plan policies."

Nuveen Real Estate (0734), CBRE Global Investors (0644)

Modify text of Policy to state that in addition to retail use, proposals for entertainment, leisure and café/restaurant, hotel, offices and housing are acceptable in principle at Commercial Centre locations subject to demonstrating compliance with other City Plan policies.

In addition, there should be no material weight afforded to the Edinburgh Commercial Needs Study (ECNS) for development management purposes as it was plainly not prepared as a Development Management tool.

The proposed Policy Re 6 change is proposed to better reflect other elements of the plan. A critique of the Retail and Leisure Commercial Needs Study has been submitted as a supporting document to support the view that it should not be used as a development management tool.

CBRE Global Investors (0644)

Modify Table 14 references to Meadowbank Commercial Centre to reflect planning applications that have been determined/submitted and will be determined in due course.

Ambassador Group (0683)

Support Policy Re 6, but there is currently no proposed policy context for the change of use of shop units within Commercial Centres. We propose that Policy Re 6 (Commercial Centres) is updated to cover the change of use of shop units within Commercial Centres and reflects the same flexible approach as set out at Policy Re 5 (Local Centres)

Modify Table 14 be to identify Ocean Terminal as a Commercial Centre with the potential to deliver new homes and office space in the future.

Acknowledge that the purpose of this policy is to indicate the circumstances in which retail floorspace in a Commercial Centre will be supported. It is welcomed that the proposed policy context for Commercial Centres, such as Ocean Terminal, supports a mix of uses: i.e. Policy Re 6 (Commercial Centres), Policy Hou 1 (Housing Development), Policy Econ 3 (Office Development) and Policy Econ 6 (Hotel Development), Policy Re 10 (Entertainment, Leisure and café/restaurant Developments – Other Locations) support retail, housing, office, hotel and entertainment and leisure uses within Commercial Centres respectively.

There is currently no proposed policy context for the change of use of shop units within Commercial Centres. The adopted LDP deals covers this at Policy Ret 9 (Alternative Use of Shop Units in Defined Centres). Within the Proposed Plan it addresses this in Policies Re4, Re5 and Re8. Propose that Policy Re 6 (Commercial Centres) is updated to cover the change of use of shop units within Commercial Centres and reflects the same a flexible approach as set out at Policy Re 5.

### **Supporting Responses**

Lady Road Investment S.A.R.L. (0625)

#### **Re 7 Out of Centre Development**

Archie Clark (0003)

Para. 3.266 refers to the relaxing of the conditions of this Re7 in order to allow local small-scale convenience stores, stating “This will also help meet create[sic] more sustainable communities, one of the overall objectives of the plan.”. Rather than this passive approach, should the large scale housing proposals referred to, actually be required to contain proposals for such convenience stores in order to encourage the development of a 20-minute neighbourhood Section 3.269 of Re 8 “Alternative Use of Shop Units in Other Locations” on page 142 makes the same point.

Jamie Wallace (0167)

In order to be in line with the Plan's sustainable transport objectives, there is a need to prohibit out-of-centre retail developments that are only viable in a 'drive-thru' format, which require extensive vehicle movement areas around the retail unit itself. Therefore, when assessing permission for such developments, the total site plan requirements of the development should be assessed, not just the floor area within the retail building. By requiring the total site plan to be no more than 250sqm, this will prevent certain developers claiming that their proposals are compliant on the basis that the floorspace they require is within that limit, when in fact their development would not be feasible without occupying a much larger area.

Lidl Great Britain Ltd (0181)

Criterion e. should be deleted from this Policy.

The draft policy Re 7 needs to be read in conjunction with the supporting explanatory text. However, these provide contradictory explanations of the policy and, in relation to criterion e., it is, therefore, impossible to understand the intended meaning of the proposed policy.

The majority of the draft Policy (the introductory sentence and criteria a to d) are directly comparable to the requirements of Policy Ret 6 in the adopted LDP. No objection is made by Lidl to these aspects of the draft Policy. However, objection is made to criterion e.

1. Criterion e. contradicts criteria a. to d.

The plain English reading of the policy is that all five criteria have to be met for an out-of-centre retail proposal to be acceptable. However, e. sets out three specific requirements that render the earlier criteria irrelevant. For criterion e. bans any retail proposal in excess of 250 sq m regardless of whether or not it meets a clearly identified deficiency, satisfies the sequential approach etc.

2. Criterion e. contradicts with the sequential approach/town centres first policy (Policy Re 1 and Re 7 b.)

Draft Policies Re 1 and Re 7 a. set out clearly that proposals for out of centre locations can be acceptable in principle if they demonstrate compliance with the town centres first policy. Criterion e. makes this an irrelevance and, in fact, directs out of centre development to locations at least 800m from town/local centres. There is no clear distance cut off that determines whether or not there will be interaction between a retail/leisure proposal and a centre, however, it is evident that a location that is, say, 350m from a centre, is more likely to support some linked trips into that centre than one that is located 1000m from that centre, even if both locations are correctly identified as out-of-centre. Criterion e. will discourage linked trips, especially those made on foot, between out-of-centre developments and town/local centres.

3. Para 3.265 contradicts the wording of Draft Policy Re 7.

Para 3.265 seeks to explain and justify the proposed policy Re 7. However, it is impossible to understand what is intended in the policy from this explanatory text. It is probable that para 3.265 is intended to refer to criterion e. but this is not clear. It refers to “four mutually exclusive scenarios” – but there are five criteria in the policy and the wording of the policy is not that they are mutually exclusive but that all should be satisfied.

If one considers e. then there are only three scenarios described i.e.:

- No more than 250 sq m in size
- Located where there is a need for a retail unit
- And is >800m from a designated centre/established out of centre retail units

Again there is no suggestion that these are mutually exclusive. Rather the wording of e. is that they all need to be satisfied.

Para 3.265, rather than explain and clarify the policy simply confuses and, when one reads the policy with the supporting text as a whole, it is not possible to understand what the policy is meant to mean.

3. Criterion e. is already covered by other policies.

The requirement for a proposal to be located “where there is a need” is already addressed in criterion a. and, as noted above, the principle of location is already addressed through draft Policies Re 1 and Re 7 b. (and this principle is contradicted in e.). If there is a situation where either a qualitative or quantitative deficiency is identified then the imposition of an arbitrary floorspace limit ensures that these cannot be addressed because the maximum permitted unit is far too small (see point 4 below).

4. The proposed 250 sq m is too restrictive: it will cause social inequality and increase driving to shopping facilities (i.e. it will promote unsustainable development).

Placing a limit of 250 sq m demonstrates a complete lack of understanding of retail and leisure requirements. For example, there is no question that a convenience-format store serves, primarily, local walk-in catchments. However, these formats require up to 400-500 sq m GFA. Criterion e. therefore prevents the provision of even local convenience goods shops that are designed to serve local areas. Similar principles will apply to different retail sectors.

It also prevents the ability of retail to meet identified retail deficiencies. Although the City is generally well-endowed with retail provision there are significant areas that do not have easy access to good quality retail. For example, the Edinburgh City Plan 2030 Commercial Needs Study: Retail & Leisure states, at para 7.9, in the context of limited “capacity” for convenience floorspace:

“This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally.”

In relation to comparison goods it states at para 9.8:

“with considerable additional expenditure capacity to support more new retail floorspace by 2028 under the high forecast. The low forecast should be regarded as a less likely scenario in any case.”

This study, prepared to support the preparation of the draft LDP, clearly identifies that there will be significant retail opportunities/deficiencies/capacity that should be addressed within different parts of the City. Although the preference is that the requirement for additional floorspace should be directed towards town centres. there will be requirements where it is appropriate for both convenience and comparison goods proposals in out-of-centre locations, will be well-placed to meet identified deficiencies in accordance with the town centres first principle. A restriction of 250 sq m floor area will prevent these deficiencies being met.

The effect of this is that it will deprive existing and proposed new residential areas of access to important retail facilities. This will exacerbate social inequalities and cause some residents to drive to other locations for access to shopping – this is directly contrary to the

aims of the proposed LDP to increase sustainable development and to reduce social deprivation.

5. The 800m distance threshold will encourage dispersal of retail

As well as being directly contrary to the principle of town centres first, the 800m threshold will increase the dispersal of retail activity. Where retail facilities are concentrated, either with other retail or with mixed uses, such as in centres, this encourages and supports the provision and use of public transport networks. However, dispersal reduces the potential for public transport use and, thereby, encourages use of private cars. This is directly contrary to the principle of sustainable development.

6. Criterion e. discourages new investment in retail reducing choice and competition to the disbenefit of City residents

The apparent intention of criterion e. appears to prevent any new significant retail development in any out-of-centre location. This is achieved through the three requirements of part e. This approach will reduce investment in an important sector of the City's economy reducing choice for residents and exacerbating social inequalities and deprivation.

This is illustrated by reference to the recent successful appeal made by Lidl for a new foodstore at Seafield Road. This store provides a substantial improvement to retail choice for residents in Restalrig and adjoining areas. Restalrig is an area of multiple deprivation without easy access to modern food retail. At the appeal the Reporter accepted that the proposal addressed significant deficiencies, satisfied the sequential approach and did not adversely affect the vitality or viability of centres, and was easily accessible by sustainable modes of transport. As a result the appeal was upheld and planning permission granted enabling Lidl to trade from the unit. However, criterion e. would not allow a similar new retail unit in the Seafield Road location, if only on the grounds of size. This demonstrates how e. would prevent the improvement of access to important retail facilities even when the proposals are identified by an independent Reporter to be acceptable and sustainable. Criterion e. is therefore a significant retrograde proposal that will exacerbate social and economic deprivation contrary to the aims and principles set out in much of the draft LDP.

Proposed Re 7 e., read in the context of the supporting text, is unclear as to its meaning or intention. As drafted (and ignoring the explanatory text) it places a ban on all retail development in out-of-centre locations in excess of 250 sq m and will encourage the dispersal of retail within the City. It will reduce choice, increase prices and exacerbate deprivation within the city. Parts of the policy are already successfully covered by other policies (notably Re 1 and Re 7a. to d.). Rather than encourage sustainable development criterion e. will discourage sustainable development and travel.

Juniper Green & Baberton Mains Community Council (0306)

Section 3.266 refers to the relaxing of the conditions of this Re 7 in order to allow local small-scale convenience stores, stating "This will also help meet create more sustainable communities, one of the overall objectives of the plan.". Rather than this passive approach, the large-scale housing proposals referred to should actually be required to contain proposals for such convenience stores in order to encourage the development of a



20-minute neighbourhood. Section 3.269 of Re 8 “Alternative Use of Shop Units in Other Locations” on page 142 makes this very point.

Living Streets Edinburgh Group (0486)

It is noted that the policy hopes to reduce the number of car trips made for shopping. This should be reinforced by more specific requirements for accessibility by public transport, walking and cycling and contributions to be sought where enhancement is needed. There must also be a restriction on the level of parking provision to act as encouragement to provide alternatives.

Avison Young for Aldi Stores Ltd. (0526)

Delete criterion e) of Policy. Support the first 4 criterions (a-d) of policy Re 7, being consistent with national planning policy. Respondent is accustomed to the provisions of these policies, including the town centre first principle, which are commonplace across every local authority within Scotland. However, do not agree with the inclusion of criterion e), which is inconsistent with national policy and does not appear to be properly justified by any evidence available either within the emerging plan or its supporting papers. The effects of such a test within policy would have far wider implications for choice, quality of provision and allowing for innovation in the retail sector, whilst also undermining other objectives of the Plan.

The findings of the Council’s Commercial Needs Study contradicts previous findings by the Council in terms of supermarket provision across the city highlighting its limitations as a tool to inform new planning policies. This policy criterion would effectively ban any future retail development in an out of centre location over 250sqm, even where criterions a-d can be satisfied, including the criterion where it can be demonstrated that the site may be highly accessible. This is clearly unreasonable, as by improving choice within a local area, in an accessible location, this may improve the sustainability of existing shopping trips, which may for example, be to strictly car borne destinations at present.

By removing the opportunity for competition, this criterion would limit any future change and the benefits this can bring to consumer choice and access to cheaper and healthier goods, undermining wider objectives of the emerging Plan. It would limit effective competition, stifle innovation and work actively against the desire to establish effective 20-minute neighbourhoods. As a result, request that criterion e) be deleted from the Plan.

Finally, wish to comment on the supporting text to Policy Re7, including the commentary around catchment areas. The specific nature of the comments within the Plan, at paragraph 3.265, are very detailed and considered inappropriate for inclusion in a Local Development Plan. These would be better included within supporting planning guidance, if the City Council considers this to be necessary.

Also question the reason for the inclusion of supporting text which states that “Proposals seeking to meet the additional needs of a growing population should demonstrate that there [sic] are specifically meeting their needs and not the needs of the existing population”. Not only would this be impossible to demonstrate as part of a planning application submission, but the motives behind the requirement aren’t clear, particularly in cases where it is assumed, criterions a-d of the policy Re 7 have been satisfied. It is unclear why a new retail development proposal that meets all of those tests, would then

not be allowed to cater for the shopping needs of both existing and new populations within certain parts of the city. Again, this commentary appears to want to stifle any future change in retail choice within Edinburgh, and limit competition, even where this may lead to wider benefits in terms of providing local and more sustainable choice to an area. This is not supported by national planning policy and this oversteps in terms of planning working actively against the wider public interest.

Furthermore, note the comments that “Proposals for non-local provision, for example a free-standing retail unit which would trade over a much wider area and encourage car-borne shopping, would not be acceptable in terms of this policy.” Whilst the aspirations behind these comments seem obvious and have merit, in that they seek to encourage more sustainable means to access foodstore provision, which we actively support, they fail to recognise the existing retail landscape that exists, whereby the majority of Edinburgh’s population (as across the UK) will utilise their private vehicles to undertake food shopping given the volume of goods often purchased. Restrictions on allowing greater choice and particularly those within policy that would actively limit new competition, which may, depending on the site, be more sustainably located, will not lead to a transformation of the shopping patterns that currently exist and instead would regrettably work against those ambitions.

While Aldi may be able to address criterions a-d of Policy Ret 7, criterion e) would effectively prevent any further store development within Edinburgh city, despite all the wider benefits that would be delivered. It is therefore clear that policy criterion (e) should be deleted. This would not undermine the other aspects of the policy but instead allow for balanced decision making, which is an essential part of the planning system.

## **Re 8 Alternative Use of Shop Units in Other Locations**

### Leith Central Community Council (0614)

Single convenience shops and parades of small shops should be protected like at 106-154 Leith Walk.

### Edinburgh World Heritage (0339)

Generally support the identification of speciality shopping streets, though we are unclear as to the specific policies governing these and greater clarity would be beneficial.

As a number of these areas fall within those we wish to focus our grants and advice, we would welcome engagement in development proposals so we can add value to this city strategy.

## **Re 9 Entertainment, Leisure and café/restaurant Developments: Preferred Locations**

### Crosswind Development Ltd (0184)

Object to Re 9 (a) on the grounds that not all town and local centres have been appropriately identified within Table 14 ‘Network of Centres’. Table 14 lists West Edinburgh as a “Proposed New Centre” however the imprecise wording does not provide clarity on the site’s allocation. Place Policy 17 and Map 24 show that there is an intention for a town/locale centre to be located within the H61 however this needs to be confirmed

within Table 14. If it is not amended this would preclude H61 from accommodating entertainment, leisure and café/restaurants development.

In addition, seek an amendment to include text to support the principles of the 20-minute neighbourhood.

Leith Central Community Council (0614)

Noise Impact Assessments made by independent professionals should be required for all arts, café/ restaurant, leisure, entertainment facilities and visitor attractions. Planning applications should assess potential negative impacts on the environment and local residents.

Cockburn Association (0777)

Seek clarification of the criteria for determining ‘ a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents’.

Terry Levinthal (313)

Support. Particularly welcome the importance of amenity and impact to residential amenity in these policies, supporting the statement that "unacceptable increase in noise, disturbance, on-street activity or anti-social behaviour" is a criteria for refusal or non-support. It is therefore essential that criteria are agreed as to what is "unacceptable" and that the focus for this is from the resident's view as opposed to the operator or applicant.

In several cases, CEC planners have dismissed these issues under a bland view that if you live in the centre, you are not entitled to a level of amenity enjoyed by others, a point echoed by many applicants and business associations.

**Support Responses**

Theatres Trust (0183), Living Streets Edinburgh Group (0486)

**Re 10 Entertainment, Leisure and café/restaurant Developments: Other Locations**

Archie Clark (0003)

This section should include proposals on how to develop the use of local arts and cultural centres such as Whale Arts and North Edinburgh Arts that promote learning and culture and a sense of community for residents of all ages and backgrounds.

Local Churches are often places where people gather for a variety of reasons – church-related (services), entertainment, organisations, nursery school, community meetings and to place their vote. Are these not worthy of a mention in this section.

Crosswinds Development Ltd (0184)

Seek a modification to Policy Re 10 to include text to support the principles of the 20-minute neighbourhood. This will provide recognition that sites outside of recognised

centres may support sustainable development choices.

#### Juniper Green & Baberton Mains Community Council (0306)

This section should include proposals on how to develop the use of local arts and cultural centres such as Whale Arts and North Edinburgh Arts that promote learning and culture and a sense of community for residents of all ages and backgrounds. Local places of worship are often places where people gather for a variety of reasons – faith-related, entertainment, organisations, nursery school, community meetings and to vote, and should also be mentioned in this section.

#### T Klan (0307)

Policy Re 10 deals with the potential for Entertainment, Leisure and Café /Restaurant developments and states Local Centres are a preferred location for such uses. But this is inconsistent with the Local Centres Policy Re 5 which bases its assessment on the quantum of retail, as opposed to an evaluation of all other options in a sequential test approach. This is likely to prove problematic in determining planning applications. Therefore, delete “in the urban area”. There are a number of locations outside the urban area that do, or will, have good sustainable transport links and a character that would support such development, such as at Summerside on Old Dalkeith Road.

#### Living Streets Edinburgh Group (0486)

Support if b. revised for consistency to refer to public transport, foot and cycle rather than sustainable transport which arguably could include electric or low emission cars. Is there such a thing as an “acceptable” increase in traffic, we don't think so. The policy requires tightening up and clarifying.

#### Cockburn Association (0777)

Support subject to clarification of the criteria for determining “a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents.”

### **Supporting Responses**

Nuveen Real Estate (0564), CBRE Global Investors (0644), Nuveen Real Estate (0734)

### **Re 11 Food and Drink Establishments**

#### New Town & Broughton Community Council (0254)

Policy is a direct copy of the existing LDP Policy Ret 11. However, under the footnote (3.277) it references the Council's ‘Guidance for Businesses’ which identifies sensitive areas in this regard, including ‘Broughton Place/Picardy Place and their environs’.

This seems incorrect and it would be helpful to correct the description which may include parts of Broughton Street and Leith Walk. As far as we are aware, there are few remaining residential units in Picardy Place.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

No changes are required at this stage, however, the Council should note that, as it stands, draft NPF4 would extend the impacts of Policy Re 11 Food and Drink Establishments to include health and wellbeing which could also be reflected in the policy criteria of the proposed plan.

Cockburn Association (0777)

Support subject to clarification of the criteria for determining 'an unacceptable increase in noise, disturbance, on-street activity or anti-social behaviour to the detriment of living conditions for nearby residents'.

**Appendix B**

Nuveen Real Estate (0564)

For clarity, Nuveen request that the addresses against 'City Centre Retail Core' under the 'Town Centres' section of this table be updated to reflect the new postal addresses of the St James Quarter, rather than the now demolished St James Centre (e.g. 1-111 St James Centre). A list of these can be provided separately.

**Retail Strategy**

Brian Tiplady (0641)

There should acknowledgement of the probable actual decline in retail space in the city, and plans for managing it. This should include identifying areas where retail can be sensibly converted to other uses, and encouraging this. In particular, accordance with the centres-first policy, a reduction in commercial centre space may be required, though retail in the city itself will also be affected.

The policy completely ignores the structural changes that are continuing to take place in retailing. In the time-frame of the plan we will need less bricks-and-mortar retailing capacity. How much less is unclear, but the implicit assumption in the report that the shift to online will involve a slowing of growth rather than an actual and substantial shrinkage, looks completely unrealistic. In accordance within the centres-first policy, which I support, a reduction in commercial centre space may be required. Hermiston Gait appears to be a prime candidate for eventual closure - as is made clear in another section of the report it has poor public transport connections, and no local function - the nearest residents are more than 10 minutes walk away. The Gyle is only two miles away and much better connected. It is important that the decline in retail capacity be managed, as this will ensure that alternative uses are appropriate, and avoid areas with numerous boarded up units among shops that are trying to operate normally.

Avison Young for Aldi Stores Ltd. (0526)

Remove paragraph 2.143. Pleased to note the strong support given by the emerging City Plan to the retail sector, highlighting its importance for the wider economy, particularly by providing employment for Edinburgh citizens. The significance of the retail sector extends

further than this though, and also needs to be viewed in terms of its contributions to the supply chain through sourcing products from a range of food and beverage manufacturers both within Edinburgh, the Lothians and across wider Scotland and in terms of ensuring the local population have access to affordable, high quality and healthy food products delivering much wider benefits to the city region.

Within this context wish to comment directly on the references within the Plan to the findings of the Commercial Needs Study. A number of these comments were previously submitted to the 'Choices' consultation in April 2020 and remain relevant here, given that the evidence paper is continuing to be used for longer term policy-making purposes and has led to the introduction of severely inflexible planning policies that we consider are inappropriate and contrary to national policy set out within SPP.

Firstly, it is important to reassert that the evidence paper, known as the 'Commercial Needs Study', provides very specific information about certain aspects of retail provision across Edinburgh, however it has significant limitations in terms of decision-making on individual planning applications.

Where the study is most helpful is in assessing future requirements in terms of both convenience and comparison floorspace that need planned for at a macro level, particularly given the extent of population growth anticipated within the city.

In terms of convenience retailing, note the key findings of the document referenced regarding the general provision of supermarkets and discount foodstores. This means that the emerging LDP does not, except for within large areas of residential expansion, need new allocations made for supermarket floorspace. It does not however mean that there should be a policy to ban the development of additional retail floorspace, where this can be justified (typically through a retail impact assessment). We consider that this is best considered during the determination of planning applications and not set out explicitly within the development plan.

On this point, the author of the Retail Study supports this view at paragraph 7.4 when they discuss 'Acceptable levels of retail impact.' The report acknowledges that "Across Edinburgh as a whole, the scope for further new convenience floorspace will mostly be in the form of trade diversion from existing stores, and in opportunities to improve the quality, range and choice of convenience shopping." This acknowledges that qualitative improvements can still be required in certain pockets across the city, given that qualitative deficiency is afforded the same level of weight within Scottish Planning Policy as quantitative matters. It also acknowledges that there can be situations where acceptable levels of trade diversion can occur without undermining the vitality and viability of centres and that these can then be acceptable in policy terms.

This is important to recognise given that competition is not a planning matter and it should not be for the planning system to protect existing out of centre retailers from this. This limits choice for the consumer and protects existing retail outlets from competition. This cannot be in the public interest and protects incumbents only. The points made about Aldi, being a disruptor in the convenience retail market, reducing grocery goods prices for consumers, and as a result, competitors doing the same, are very important here and would not have happened if such restrictive policies had been in place.

The report concludes that section by stating that "This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally." We do

not consider that this position has been accurately reflected within the emerging Plan and this requires reconsideration.

In support of the above request, we note that this was considered by the Examination into the Perth and Kinross Local Development Plan, where a respondent queried why the capacity identified in Perth's own retail study had not been identified within the plan itself. The reporter who considered this issue in their Examination report, concluded that: "I see no need to make reference to the retail studies produced in 2014 and 2016. These studies are an important part of the evidential underpinning for the proposed plan. However, they are only a snapshot of activity and potential within the sector. They may only be relied upon in the determination of individual planning applications at the time of their production. A more agile approach to retail data is needed when determining individual proposals over the plan period. This approach should take account of the effect of changing trends in the retail sector and the findings of any retail impact assessment produced for the proposal. Writing the findings of existing retail studies into development plan policies now would not be compatible with this more agile approach."

It is therefore clear from the statements above that the wording within the emerging Plan is inflexible and inappropriate for inclusion, given it represents only a fixed time period and has little relevance to the more agile considerations needed for individual planning applications for retail developments. Moreover, it is worth noting that the conclusions that there is no need for more retail floorspace in future rely largely on an expectation that all current commitments, as outlined in Table 6.12 of the Commercial Needs Study are delivered within the timespan of the Plan (some of which date back to 2014). This further highlights why it is inappropriate to use the conclusions of the capacity study to formulate policies within the Plan.

The weaknesses of relying on the Study are particularly apparent when the conclusions of the report contradict the position set out within the Council's previous analysis, 'Access to supermarkets and food shopping in Edinburgh', which was published in September 2011. At that time, the City Council undertook a detailed review of provision across the city and concluded (amongst other matters), that "areas where choice is significantly constrained are on the western fringes of the city". However, we note that since then there have been no improvements to the provision within this part of Edinburgh, yet the Commercial Needs Study, which includes this whole area within 'Zone 5' fails to reach a similar conclusion, no doubt because the area incorporates Corstorphine and the Gyle, where there are foodstores of a significant scale leaving a highly unbalanced range of provision in this area. A retail impact assessment for that part of the city would therefore likely identify a high level of local deficiency to be addressed, as per the Council's previous report. Basing decisions for future provision on the Commercial Needs Study would mean that there is no need for improved choice to serve the villages of Juniper Green, Currie and Balerno for example and it is difficult to understand how the Council's aims for the delivery of 20-minute neighbourhoods can be achieved in such circumstances and where such deficiencies will continue to remain.

Ultimately it is clear that the Council's position within the emerging Plan contradicts their previous, better evidenced, analysis that there are pockets of the city that do require improvements to shopping choice. We therefore strongly assert that the proposed policies within the Plan, that rely on the Commercial Needs Study, specifically policy Re7, are unnecessarily restrictive and lack sufficient evidence to support them and as a result, require significant amendment.

Leith Central Community Council (614)

2.141 “In Edinburgh, shopping and leisure uses are mainly provided in a network of centres distributed across the city.”

This sentence is repeated twice in the same paragraph

**Modifications sought by those submitting representations:**

**Re 1 Town Centres First**

Leith Central Community Council (0614)

Modify text of Policy Re1 to reduce 2,500sqm threshold requirement for Retail Impact Analysis.

Crosswind Development Ltd (0184)

Modify policy to the following;

“Planning permission will be permitted for retail and other uses which attract a significant amount of people including commercial leisure use, community and cultural facilities and where appropriate libraries, education and healthcare facilities in the following order of preference:

- a. Town centres (including city and local centres)
- b. Edge of town centre
- c. Other commercial centres as identified in the plan
- d. Out of centre locations that are or can be made easily accessible by a range of sustainable transport modes.

In addition, the provision of such facilities will be supported where by in doing so the creation of or support for a 20 minute neighbourhoods would be achieved.

Where a retail or leisure development with a gross floorspace over 2,500sq.m. or occasionally for smaller proposals, if proposed outwith a town centre and contrary to the development plan, a retail impact analysis will be required sufficient to demonstrate that there is no significant adverse effect on the vitality and viability of existing town centres. To support the role of town centres in a 20-minute neighbourhood, the town centre first assessment and associated requirements should be applied flexibly and realistically for community, education, health and social care and sport and leisure facilities. Town and local centres within adjoining council areas will also be considered when assessing retail impact if they fall within the intended catchment area of the proposal”.

Modify Table 14 so all new proposed town/local centres are included under the relevant heading.

**Re 2 City Centre Retail Core**

Hazledene House Limited (0695)



Modify policy to adopt a new and innovative approach to the future role of City Centre Retail Core which takes both the changing nature of retail and significantly lower demand for shops into account.

Edinburgh World Heritage (0339)

Modify the policy to add the following as a consideration; “The balance of overall uses in the area, including residential and cultural uses”

**Re 3 Town Centres**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

Modify the town centres listed in 3.250 to include the following “../Tollcross, Juniper Green/Currie/Balerno.”

Modify the Glossary definition of “Active frontage” to “street door access”

Juniper Green & Baberton Mains Community Council (0306)

No specific modification identified.

Peter Allen (0336)

Modify policy to link together town centres (e.g. Portobello to Leith, through Seafield)

The Davidson's Mains and Silverknowes Association (0454)

Modify Plan to introduce policies to promote and develop these including better local transport links.

**Re 4 Alternative Use of Shop Units in the City Centre and Town Centres**

Hazledene House Limited (0695)

No modification to plan proposed.

**Re 5 Local Centres**

Archie Clark (0003)

Modify the plan to include provision of a museum and local council offices in central Currie. Response infers change to glossary definition of Local Centre.

Asda Stores Limited (0142)

Modify the plan to identify Leith Waterfront local centre.

Crosswinds Development Ltd (0184)

Modify Table 14 to include explicitly that a new local centre is proposed at site H61 as illustrated on Map 24 and that another town centre is proposed at H63.

Tarmac (0244), T Klan (0307)

Modify policy Re 5 to include the following; 'planning permission for new Local Centres which support existing or proposed communities will be permitted provided the proposal ..... '

T Klan (0307)

Modify definition of Local Centre in the Glossary to include Class 1, 2 and 3 uses.  
Modify Part 4 Table 14 in Appendix B to include South East Edinburgh as a proposed Local Centre.

Inverdunning (Hatton Mains) Ltd (0427)

Modify Table 14 to include Hatton Village as a proposed new local centre/hub

The Davidson's Mains and Silverknowes Association (0454)

Modify the plan to include the shopping centre at Silverknowes Road as a Local Centre.

AEW (0524)

Modify the policy to the following;  
Proposals for non-retail development in a local centre or on edge of a local centre which would have a detrimental impact on the function of the centre will not be permitted, .....unless as part of a comprehensive mixed use redevelopment or regeneration proposal to re purpose or re-invigorate a local centre.

The change of use of a shop unit in a local centre to a non-shop use will be permitted provided:

f) The change of use would not result in half the units in the centre being in nonshop use, and

g) The proposal is for an appropriate commercial, community or business use, which would complement the character of the centre and would not be detrimental to its vitality and viability.

.....or .....

h) The proposal is part of a comprehensive residential led mixed use redevelopment

Avison Young for Aldi Stores Ltd. (0526)

Modify plan to include the Aldi at Dock Street as part of a future established Local Centre.

Hallam Land Management (0615)

Modify policy to add following clause; 'planning permission for new Local Centres which support existing or proposed communities will be permitted provided the proposal ..... '

Modify definition of Local Centre in the Glossary to include Class 1, 2 and 3 uses.

Modify Table 14 to include Craigiehall as a proposed Local Centre.

Policy Re 5 local Centres is inconsistent with Policy Re 10 Entertainment, Leisure and Café/Restaurant developments, however, no modification identified.

## **Re 6 Commercial Centres**

Robyn Kane (0091)

No modification identified

Nuveen Real Estate (0564)

Modify Policy to include a similar criterion to Policy Re 2, in requiring proposals to provide high quality, commercially attractive units to a high standard of design, that improve the appearance of the commercial centre.

Modify Table 14 by amending reference to Craighleith Retail Park to the following;

"Existing – Retail park which opened in 1996. 20 Units. Mix of bulky goods, fashion, food retailing, leisure, petrol station and shopper amenities including drive through restaurant.

Future – Scope for future reconfiguration and enhancement. "

Modify policy to include similar provision to criterion a) of Policy Re 2.

Modify policy to insert of the following sentence: "In addition to retail use, proposals for entertainment, leisure and café/restaurant, hotel, offices and housing are acceptable in principle at Commercial Centre locations subject to demonstrating compliance with other City Plan policies."

Nuveen Real Estate (0734)

Modify policy to insert of the following sentence: "In addition to retail use, proposals for entertainment, leisure and café/restaurant, hotel, offices and housing are acceptable in principle at Commercial Centre locations subject to demonstrating compliance with other City Plan policies."

CBRE Global Investors (0644)

Modify policy by inserting the following text;

"In addition to retail use, proposals for entertainment, leisure and café/restaurant, hotel, offices and housing are acceptable in principle at Commercial Centre locations subject to demonstrating compliance with other City Plan policies."

Modify Table 14 references to Meadowbank Commercial Centre as follows;

[Existing Role] "Smaller urban retail park which opened in 1997. 10 units. Mix of homeware and clothing stores, supermarkets, leisure uses, drive through restaurants/coffee shops and local amenities. Located in high density residential area with good bus services."

[Future Role] "Permission granted in 2021 to allow change of use of a retail unit from comparison to convenience goods. Scope for future reconfiguration or enhancement."

Ambassador Group (0683)

Modify Policy to cover the change of use of shop units within Commercial Centres and reflects the same flexible approach as set out at Policy Re 5 (Local Centres)

Modify Table 14 be to identify Ocean Terminal as a Commercial Centre with the potential to deliver new homes and office space in the future. Also update to the following;

- Role and character - The table notes that Ocean Terminal has 87 units, whereas the current LDP indicates the Centre has 80 units
- Current Commitments and Future Role - We request that the table be updated to identify Ocean Terminal as a Commercial Centre with the potential to deliver new homes and office space in the future. The demand for retail and leisure space at Ocean Terminal is likely to change over time and it is vital that the policies set out in City Plan 2030 support the adaptation of accessible brownfield sites such as Ocean Terminal to provide a mix of uses in the future. This flexibility will ensure creation of vibrant, sustainable places and spaces and contribute towards the regeneration of Leith and the waterfront.

## **Re 7 Out of Centre Development**

Archie Clark (0003)

Modification not specified but infers removing reference to small retail units less than 250sqm.

Jamie Wallace (0167)

Modify policy to apply to total site plan requirements and not just the floor area within the retail building.

Lidl Great Britain Ltd (0181), Avison Young for Aldi Stores Ltd. (0526)

Modify the policy to delete Criterion e.

Juniper Green & Baberton Mains Community Council (0306)

Modify plan so the large-scale housing proposals referred are required to contain proposals for such convenience stores in order to encourage the development of a 20-minute neighbourhood.

Living Streets Edinburgh Group (0486)

Modify policy to add more specific requirements for accessibility by public transport, walking and cycling and contributions to be sought where enhancement is needed. There must also be a restriction on the level of parking provision to act as encouragement to provide alternatives.

## **Re 8 Alternative Use of Shop Units in Other Locations**

Leith Central Community Council (0614)

Modify policy so single convenience shops and parades of small shops are protected like at 106-154 Leith Walk.

Edinburgh World Heritage (0339)

No modification identified.

**Re 9 Entertainment, Leisure and café/restaurant Developments: Preferred Locations**

Crosswinds Development Ltd (0184)

Modify Table 14 to include a local centre in allocation H61

Modify the text to include the following;

“Planning permission will be permitted for high quality, well designed arts, café/ restaurant, leisure and entertainment facilities and visitor attractions in the City Centre, at Leith and Granton Waterfront, in a town centre, and local centres provided:

- a. the proposal can be integrated satisfactorily into its surroundings with attractive frontages to a high quality of design that safeguards existing character,
- b. the proposal is compatible with surrounding uses and will not lead to a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents, and
- c. Support the principles of the 20-minute neighbourhood by ensuring the development will be easily accessible by public transport, foot and cycle.”

Leith Central Community Council (0614)

Modify policy to require Noise Impact Assessments made by independent professionals for all arts, café/ restaurant, leisure, entertainment facilities and visitor attractions.

Cockburn Association (0777)

No modification identified.

Terry Levinthal (313)

No modification identified.

**Re 10 Entertainment, Leisure and café/restaurant Developments: Other Locations**

Archie Clark (0003)

Modify plan to include proposals on how to develop the use of local arts and cultural centres.

Crosswinds Development Ltd (0184)

Modify policy as follows;

“Planning permission will be granted for entertainment, leisure and café/restaurants developments in commercial centres and other locations in the urban area provided:

- a. all potential City Centre, town centre, and local centre options have been thoroughly

assessed and can be discounted as unsuitable or unavailable,  
b. Support the principles of the 20-minute neighbourhood the site is or will be made easily accessible by a choice of sustainable transport and not lead to an unacceptable increase in traffic locally,  
c. the proposal can be integrated satisfactorily into its surroundings with attractive frontages to a high quality of design that safeguards existing character, and  
d. the proposal is compatible with surrounding uses and will not lead to a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents.”

Juniper Green & Baberton Mains Community Council (0306)

Modify plan to include proposals on how to develop the use of local arts and cultural centres.

T Klan (0307)

Modify policy to delete “in the urban area”

Living Streets Edinburgh Group (0486)

Modify policy criterion b) to refer to public transport, foot and cycle rather than sustainable transport.

Cockburn Association (0777)

No modification identified.

**Re 11 Food and Drink Establishments**

New Town & Broughton Community Council (0254)

Modify reference to Council’s ‘Guidance for Businesses’, which may include parts of Broughton Street and Leith Walk.

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

Modify plan to extend the impacts of Policy Re 11 Food and Drink Establishments to include health and wellbeing which could also be reflected in the policy criteria, if provisions of draft NPF4 are implemented.

Cockburn Association (0777)

No modification identified.

**Appendix B**

Nuveen Real Estate (0564)

Modify Appendix B to update addresses against 'City Centre Retail Core' under the 'Town Centres' section of this table to reflect the new postal addresses of the St James Quarter, rather than the now demolished St James Centre (e.g. 1-111 St James Centre). A list of these can be provided separately.

### **Retail Strategy**

Brian Tiplady (0641)

Modify plan to include acknowledgement of probable decline in retail space in the city, and plans for managing it.

Avison Young for Aldi Stores Ltd. (0526)

Modify plan to remove paragraph 2.143.

Leith Central Community Council (614)

Modify plan to delete duplicate sentence: 2.141 "In Edinburgh, shopping and leisure uses are mainly provided in a network of centres distributed across the city."

### **Summary of responses (including reasons) by planning authority:**

#### **Re 1 Town Centres First**

Leith Central Community Council (0614)

Policy Re 1 is largely unchanged from Policy Ret 1 in the adopted LDP (CD039). The reference to 2,500sq m is consistent with the advice in Scottish Planning Policy (CD096) paragraph 71. In addition, Policy Re 1 states that retail impact analysis (RIA) will be required where a proposal is "over 2,500sq.m. or occasionally for smaller proposals, if proposed outwith a town centre and contrary to the development plan". So the policy does require a RIA for a proposal less than 2,500sq m where it is contrary to the Plan's policies. As a result, the Council considers the requirements set out in the plan are reasonable.

Matters related to residential amenity such as opening hours and delivery schedules are material considerations, but they are matters that are more appropriately considered as part of the planning application process through an environment or noise assessment rather than as part of a retail impact analysis. Policy Env 33 of the Plan relates to preserving residential amenity and includes a requirement with regard to noise, which the Council considers is the most appropriate means to address this issue. **No modifications proposed.**

Crosswinds Development Ltd (0184)

The purpose of Policy Re 1 is to set out the Plan's town centre first approach with the application of a sequential approach. This policy is consistent with the requirements of Scottish Planning Policy (CD096) as set out in paragraphs 68 and 69, and also paragraph 71 with regard to retail impact analysis. The Council has concerns that the additional sentence proposed could result in difficulties in implementing the policy by creating the

risk of a contradiction within the policy, for example, proposals could be promoted on the grounds that they would help support 20 minute neighbourhoods and therefore arguments could be made that proposals were consistent with the policy despite being outwith designated centres, and/or without demonstrating that the sequential approach had been followed. Policy Re 7 Out of Centre Development supports small scale retail proposals, in certain circumstances in the context of creating more a sustainable community i.e. 20 minute neighbourhoods, as referred to in para 3.266. The Council considers that it is more appropriate that any such proposals, in the context of 20 minute neighbourhoods, are dealt with under this policy rather than Policy Re 1.

Table 14 identifies the network of centres across Edinburgh. There is a separate section titled, "Proposed New Centres", and West Edinburgh is identified. The Council considers it is important that the plan is read as a whole. Place Policy16 covers West Edinburgh. It sets out a series of development principles to guide development and a plan. The only reference to a town centre is in development principle b, which identified site H63 as a focus for a town centre development. The Council acknowledges that map 25 identifies a town centre on the Crosswinds site. However, the Council emphasises that the West Edinburgh area is a significant development which will take the form of an urban extension and as a result is seeking to prepare a West Edinburgh Master Plan to ensure a collaborative, and multidisciplinary approach. The optimal locations for a new town or town centres will emerge as part of that process, and it would be premature to identify Site H61 for a town centre at this stage. **No modification proposed.**

## **Re 2 City Centre Retail Core**

### Hazledene House Limited (0695)

Edinburgh City Centre represents the regional shopping centre for the Lothian city region. Evidence from the Commercial Needs Study (CD033), as referred to in paragraphs 2.143 and 2.144 of the Plan, shows that comparison goods expenditure is expected to grow over the lifetime of the plan and that the city centre is the best location capable of attracting additional comparison expenditure. The purpose of Policy Re 2 is support proposals for retail development within the city centre retail core subject to a number of considerations and is consistent with the findings of the commercial needs study. However, the Council has acknowledged the way town centres are changing and the impacts of on-line shopping by altering Policy Re 4 Alternative Use of Shop Units in the City Centre and Town Centres from the previous policy (Ret 9) in the adopted LDP. The new policy is more flexible and uses supplementary guidance as a material consideration, whereas the previous policy used statutory guidance directly to determine proposals. As a result, the Council considers the new policy strikes a healthy balance by being more supportive of a complementary range of uses with the city centre, whilst still preserving the importance of its retail function. **No modification proposed.**

### Edinburgh World Heritage (0339)

The Council considers that Edinburgh is not experiencing the same level of impact from retail decline as other cities for the reasons set out in its response to 0695 above, but has nevertheless made some policy changes to be more supportive of a complementary range of uses with the city centre, which it considers strikes a healthy balance. The Council considers the policies in the plan are supportive of residential development in the city centre and the new policy Econ 1, which is supportive of cultural uses, is an appropriate



means to encourage more of these types of uses within the city including its centre. **No modification proposed.**

### **Re 3 Re 3 Town Centres**

#### Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306)

The Council considers that the reference in criterion a to “there will be no significant adverse effects on the vitality and viability of the city centre retail core or any other town centre”, relates to the overall vitality of the centre and does not apply to specifics details e.g. whether or not there a bank branch or an ATM, or whether a local shop has a card reader, as these are not matters over which the planning system has control. The Council in preparing the Plan carried out a review of town and local centres and some alterations were made. Juniper Green, Main Street Balerno, and Bryce Road Currie continue to be identified as local centres within the Plan rather than town centres, due to their modest size and limited facilities. The Council considers there has been no material change in circumstances since the previous plan was adopted to justify altering the designation of these centres. Chesser Avenue and Wester Hailes also continue to be identified as local centres for the same reason.

The Council prefers the definition of “active frontage” as defined in the glossary. There are some shops which have access to the street but the shop is on an upper level or basement level, and therefore considers the existing text more clearly defines what an active frontage is. “Active frontage” is an established design and placemaking term used in both national policy and guidance. **No modification proposed.**

#### Juniper Green & Baberton Mains Community Council (0306)

The retail policies in the Plan seek to protect town and local centres from changes of use likely to affect their vitality and viability. However, the Plan cannot prevent shops from closing, prevent changes in broader retail trends or require designated centres to have certain shopping facilities. **No modification proposed.**

#### Peter Allen (0336)

The Council has some concerns regarding the concept of linking together centres. There is a risk of creating ribbon development, and losing the identity of the individual town centres. It would create the risk of new retail development outwith centres, which could compromise the vitality of viability of existing centres. There is no guidance in Scottish Planning Policy (CD096) to support such a concept. In contrast, the 20 minute neighbourhood approach seeks to provide an appropriate scale of facilities in areas of the city which don't have existing facilities without the risk of creating ribbon development, and without threatening the vitality and viability of existing centres. As a result, the Council does not support a change in policy to link centres. **No modification proposed.**

#### The Davidson's Mains and Silverknowes Association (0454)

The Council considers the existing policy seeks to promote town centres through the use of planning guidance which seeks to protect town and local centres from changes of use likely to affect their vitality and viability. **No modification proposed.**

## **Re 4 Alternative Use of Shop Units in the City Centre and Town Centres**

Hazledene House Limited (0695)

Policy Re 4 sets out policy with regard to proposals for change of use of a shop unit to a non-shop use in the city centre and town centres. The policy allows changes of use where they will not undermine the retailing function of the centre and where it is an appropriate use. The Council has prepared individual planning guidance for the centres which are tailored to their individual characteristics in order to guide decision making with regard to assessing whether a proposal will undermine the retail function.

Edinburgh City Centre represents the regional shopping centre for the Lothians city region. Evidence from the Commercial Needs Study (CD033), as referred to in paragraphs 2.143 and 2.144 of the Plan, shows that comparison goods expenditure is expected to grow over the lifetime of the plan and that the city centre is the best location capable of attracting additional comparison expenditure. However, the Council has acknowledged the way town centres are changing and the impacts of on-line shopping by altering Policy Re 4 from the previous policy Ret 9 in the adopted LDP. The new policy is more flexible and uses supplementary guidance as a material consideration, whereas the previous policy used statutory guidance directly to determine proposals. As a result, the Council considers the new policy strikes a healthy balance by being more supportive of a complementary range of uses within the city centre, whilst still preserving the importance of its retail function. In addition, the Council has recently adopted updated City Centre Supplementary Guidance (CD046) in January 2020. The updated guidance significantly changes the policy position particularly for Princes Street where it allows up to a third of the units within each block to change to non-shop use. The previous guidance (CD150) adopted in February 2014, in contrast, only allowed a change of use on Princes Street to Class 3 food and drink where it was in a location that could accommodate outdoor seating and the unit was under 500 sq m. The Council considers the change in policy and guidance is radical, and given the new guidance was introduced during Covid 19 it will take time for the consequences of this change to be realised. However, the Council is committed to regular review of the guidance. With regard to the use of upper floors the supporting text in paragraph 3.252 makes it clear that policy is only intended to apply to ground floor units or basement/first floor units that are directly accessed from the pavement. **No modification proposed.**

## **Re 5 Local Centres**

Archie Clark (0003)

The Council agrees that the local centres identified in the plan are quite variable and that the definition in the glossary is unintentionally inconsistent with the aims of the plan. The Council considers the glossary should state, "centres of less than 10 units have been included in order to provide a local centre within 10 minutes walk of residents where possible." While local centres may vary in terms of size and facilities, the Council still considers them to provide the function of a local centre. In addition, it is important to recognise that the planning system has some limitations in terms of how much it can influence facilities and changes to facilities within local centres. Occupiers of units can change over time, without it resulting in a change of use class and the Council cannot prevent that. In addition, it is important to recognise that a key reason for identifying local centres is to enable Policy Re 5 to be applied. This policy is supportive of further retail

development in these designated centres where the criterion of the policy are met and it also supports change of use of shop units in certain circumstances. If local shopping parades are not identified as local centres, then Policy Re 7 and Re 8 would apply. These policies generally are more restrictive. The Council acknowledges there is a technical error and that the glossary should be correct as a minor drafting/technical matter.

The Council notes the suggestion for a museum and local council office in Currie. However, the Council has no committed plans to bring forward such schemes at this time and therefore it would be inappropriate to identify such proposals in the plan. **No modification proposed.**

#### Asda Stores Limited (0142)

The Council carried out a review of the Town Centres and Local Centres identified in the adopted LDP (CD039) when preparing the Plan, including the proposed centres, and took a decision to drop the proposed centre at Leith Waterfront. The Council considers the Asda at Leith has a different context to the other Asda stores and doesn't constitute a local centre. The Store at the Jewel is adjacent to the Newcraighall Commercial Centre, a significant commercial centre that has one of the largest turnovers in the UK. The store at Chesser forms part of a larger local centre including the Corn Exchange and the Edinburgh West Retail Park. In contrast, the Leith store is a single isolated store and the locality lacks the characteristics, the sense of place and range of shops or facilities one would expect in a local centre. The Council considers the character of the locality is unlikely to change and therefore has dropped the proposal to identify the store as part of a local centre. Should circumstances change and further development occur that alters the character to be more in keeping with a local centre the Council could subsequently factor that into the next review of local centres. **No modification proposed.**

#### Crosswinds Development Ltd (0184)

The Council does not agree that Table 14 should be amended for the reasons set out in its response to 0184 under Policy Re 1. **No modification proposed.**

#### Tarmac (0244)

The Council does not support the allocation of the Bairdview site (Site )as set out in its response to 0244 in Issue 9: Suggested additional greenfield sites Therefore, the Council does not support the allocation of a new proposed local centre at Bairdview. **No modification proposed.**

#### T Klan (0307)

The Council does not support the allocation of the South East Edinburgh site (Site 14) as set out in its response to 0307 in Issue 9: Suggested additional greenfield site Therefore, the Council does not support the allocation of a new proposed local centre at South East Edinburgh. **No modification proposed.**

#### Inverdunning (Hatton Mains) Ltd (0427)

The Council does not support the allocation of the Hatton Village site ( Site 31) as set out in its response to 0307 in Issue 9: Suggested additional greenfield sites Therefore, the

Council does not support the allocation of a new proposed local centre at Hatton Village.  
**No modification proposed.**

The Davidson's Mains and Silverknowes Association (0454)

The Council carried out a review of the Town Centres and Local Centres identified in the adopted LDP (CD039) when preparing the Plan. There are a number of small parades of shops across Edinburgh that serve a local function, but are not considered to constitute a Local Centre in terms of its characteristics, the sense of place and range of shops or facilities one would expect in a local centre. For example, there is a small parade of shops on Comiston Road in the vicinity of Craiglea Drive that does not constitute a centre and there is a parade of shops on Saughton Road North, Carrick Knowe that also does not constitute a centre. There has been no material change in circumstances at Silverknowes Road since the last LDP was adopted and therefore the Council considered there was no justification to identify it as a local centre. **No modification proposed.**

AEW (0524)

The purpose of policy Re 5 is to support appropriate retail development within or on the edge of local centres. The policy also has flexibility, supporting changes of use to non-retail use where the criterion of the policy has been met. This criterion has been altered from the adopted LDP policy (Ret 9), which would not allow changes where it would result in four or more units in non-shop use. The new policy allows up to half the units in a local centre to be in non-shop use. The Council considers this a significant change, which responds to the change in retail trends. The Council does not support the proposed changes to the wording of the policy which imply that a proposal that would have a detrimental impact on a local centre would be acceptable as long as it was part of comprehensive redevelopment. It is important to recognise that the Ryden Commercial Needs Study retail report (CD033) shows that over the lifetime of the plan whilst there is no requirement for further convenience retail floorspace that does not mean there is justification for less of it. The population of Edinburgh is still rising, which will offset any fall in expenditure over time. It is important that the retail function of centres is still protected whilst allowing more flexibility to provide supportive uses to maintain vibrancy.

The Council carried out a review of the Town Centres and Local Centres identified in the adopted LDP (CD039) when preparing the Plan. The Council acknowledges that the Wester Hailes local centre is one of the larger ones as referred to in paragraph 2.141 of the Plan. The Council does not consider that Wester Hailes has the character of a town centre. The glossary of the plan defines town centres as, "Centres that provide a diverse and sustainable mix of activities and land uses which create an identity that signals the function and wider role." There are eight existing town centres identified in the Plan. They all have a distinctive historic identity, many of which were historic towns which became merged with Edinburgh as it expanded and provide a wider social and community role to the communities around them. Wester Hailes is different to these, it has the feel of a local centre "a local centre is a shopping centre, usually of 10 units or greater, serving a local retail function" as defined in the glossary, but the appearance of a small commercial centre, with a series of large buildings surrounded by large area of cumulative car parking.

The Council notes that since the representation was submitted the Wester Hailes Plaza has been sold and purchased by a new owner. Although the Plan does identify a housing led mixed use development next to Wester Hailes local centre (H82) it is an isolated

development. The Council has commissioned masterplanning for regeneration of the wider area and the community is preparing a local place plan. As a result, the Council does not consider it would be appropriate to allocate this site and prepare a place based policy at this time. Policy within the plan is supportive of office development in Policy Econ 3 in designated centres, including local centres. In addition, Policy Econ2 is supportive of housing within proposed commercial developments if the site is larger than 0.25ha. Therefore, proposals for mixed use development, including residential, could be considered in principle as being consistent with the requirements of the plan. The Council considers there is no requirement for this specific proposal to be included within the plan as its not required in order to deliver the development plan strategy and that the proposal could be considered in the context of the existing provisions of the Plan through the planning application process. **No modification proposed.**

#### Avison Young for Aldi Stores Ltd. (0526)

There is a basic definition of a local centre as set out in the glossary of the plan which states, "For the purposes of this Plan a local centre is a shopping centre, usually of 10 units or greater, serving a local retail function." The Council acknowledges that the local centres identified in the plan are quite variable. However, it is important that a local centre has the sense of place and coherent form that gives it the character of a local centre. In a large urban area like Edinburgh there are parades of shops distributed throughout the city providing retail facilities, but they don't all provide the coherent form or sense of place of a local centre. In the Leith area there are two local centres identified, both on Ferry Road. One of them is centred around Leith Public Library which has a clear sense of place, and the other further to the west which has a long parade of shops and a traditional Scottish High Street feel. In contrast the Aldi store is a standard format stand-alone supermarket unit, with a blank façade that faces onto Commercial Street opposite former commercial buildings. On Dock Street it faces on to its own a car park, and is immediately surrounded by blocks of flats. As a result, the Council does not consider the Aldi store itself constitutes a local centre nor does it form part of a local centre. The Council does not agree that the boundary proposed constitutes a local centre. Whilst it does include various parades of shops including the Aldi store it does not have the clear sense of place or coherent form that a local centre has, instead it represents an area or segment of urban form with no common identity. Identifying the area proposed as a local centre would create a local centre that was inconsistent with the others within the plan. **No modification proposed.**

#### Hallam Land Management (0615)

The Council does not support the allocation of Craigiehall for residential led mixed use development for the reasons set out in its response to 0615 in Issue 9 Suggested additional greenfield sites. Therefore, it does not support Craigiehall being identified as a proposed local centre.

The Policy is intended to apply to identified local centres, supporting proposals for retail and changes of use, where they meet the terms of the policy. Proposals for new centres are set out in the Place policies in the context of new allocations.

The Council does not consider it helpful to modify the definition of Local Centres to make reference to use classes. The types of uses within a centre can be variable and include a

wide range of uses including retail, leisure, garages, cafes, community facilities, churches etc. As a result, the definition needs to be more flexible.

Policy Re 10 and Policy Re 5 are very similar to Policies Ret 10 and Ret 5/Ret 9 of the adopted Plan, the latter two having been merged into Re 5. The Council has not experienced any problems determining planning applications. Policy Re 10 sets out the policy position for Entertainment, Leisure and Restaurant uses in Commercial Centres and other locations outwith designated centres. It applies the sequential approach preferring designated centres first. Only where other locations are not available, and that may include a local centre, where a proposal is unable to meet the criterion of policy Ret 5, then a proposal may be considered in an out of centre location subject to all the criterion of the policy being met. As a result, the Council does not agree the policies are inconsistent. **No modification proposed.**

### **Re 5 Commercial Centres**

#### Robyn Kane (0091)

The proposal for a cinema at Cameron Toll has been granted planning permission. The Plan sets out the factual position. **No modification proposed.**

#### Nuveen Real Estate (0564)

The city centre is a world heritage site and has numerous buildings of historic importance. As a result, the Council considers it reasonable for Policy Re 2 to require high quality commercial units with a high standard of design. The Council does not consider it necessary to stipulate the same requirements for Commercial Centres, nor does it consider it relevant to 'levelling the playing field'.

The Council does not consider it reasonable or pragmatic to refer to planning applications that have been submitted but are yet to be determined as it implies that the proposals are acceptable.

The Council does not consider it necessary to include a reference to entertainment, leisure and restaurants etc within the policy. The Council considers the plan should be read as a whole. Policy Re10 sets out the policy position with regard to entertainment, leisure and restaurant developments in commercial centres. Policy Econ 6 sets out the policy position with regard to hotel developments and Policy Econ 3 sets out the policy position with regard to office developments. Paragraph 3.262 also has a cross reference to Econ 3. **No modification proposed.**

#### Nuveen Real Estate (0734), CBRE Global Investors (0644)

The Council does not consider it necessary to include a reference to entertainment, leisure and restaurants etc within the policy for the reasons set out in its response to 0564 above.

The Commercial Needs Study Retail paper (CD033) was prepared to inform the preparation of the Plan. The status of the Commercial Needs Study in the context of assessing planning applications is not relevant for the purposes of the examination of the Plan. What is a relevant material consideration is a matter for a decision maker at the

time of the assessment of the planning application and will depend on the individual circumstances of the case. **No modification proposed.**

#### CBRE Global Investors (0644)

The Council considers it reasonable or pragmatic to only refer to planning applications that have been determined. The Council acknowledges there is a technical error and the text should be corrected as a minor drafting/technical matter as follows;

Existing Role:

“Smaller urban retail park which opened in 1997. 10 units. Mix of homeware and clothing stores with two supermarkets, leisure use and drive through restaurant/cafe. Located in high density residential area with good bus services”. And

Future Role:

“Permission granted in 2021 to allow change of use of a retail unit from comparison to convenience goods. May be scope for future reconfiguration or enhancement”

#### Ambassador Group (0683)

Policy Re 6 sets out the policy requirements for proposals for retail development within existing commercial centres. The Council considers the plan should be read as a whole. Policy Re10 sets out the policy position with regard to entertainment, leisure and restaurant developments in commercial centres and is supportive in principle subject to the requirements of the policy being met. Policy Econ 6 sets out the policy position with regard to hotel developments and Policy Econ 3 sets out the policy position with regard to office developments. Paragraph 3.262 also has a cross reference to Econ 3. These policies are supportive of these uses in commercial centres. In addition, Policy Hou1 is also supportive of housing development in principle on commercial centres. The policy position with regard to commercial centres is different to local centres and complex. The Council does not consider it pragmatic to refer to change of use within Policy Re 6 and prefers to set out these matters in other policies as a means of more clearly articulating the Plan’s strategy.

With regard to Table 14, the strategy of the Plan in principle supports housing, and office development in Commercial Centres. No modification proposed, however, should the Reporter be so minded the text of Table 14 under the column “Current Commitments and Future Role” could be amended to include a specific reference to “the strategy of the plan supporting housing, office and hotel uses in principle” in each of the Commercial centres after the existing sentence “Maybe scope for future reconfiguration or enhancement” in order to provide more clarity. **No modification proposed.**

### **Re 7 Out of Centre Development**

#### Archie Clark (0003)

Policy Re 7 sets out the Plan’s policy position with regard to proposals being brought forward for retail development in out of centre locations. Criterion e relates to small scale proposals less than 250sqm in size. With regard to the Plan’s housing led mixed use allocations, the plan is looking to proactively support proportionate retail facilities in the context of the allocation, and there is reference to this in relevant Place policies, Place 11 Newhaven Road 2, Place 12 Bangor Road, Place 13 South Fort Street etc. However, it is

also important to set out the policy position for proposals being brought forward elsewhere, and that is the role of Policy Re 7. **No modification proposed.**

Jamie Wallace (0167)

Policy Re 7 relates to retail developments only. The only drive through format businesses in Edinburgh relate to cafés and restaurants and proposals for new ones will be assessed under policies Re 9 Entertainment, Leisure and café/restaurant developments - preferred locations and Re 10 Entertainment, Leisure and café/restaurant developments-preferred locations - other Locations. As a result, the Council considers the suggested changes to policy Re 7 are not required. **No modification proposed.**

Lidl Great Britain Ltd (0181)

Policy Re 7 sets out the Plan's requirements with regard to retail proposals in out-of-centre locations. The Council emphasises that the provisions of the Plan with regard to out-of-centre retail proposals have been carried over from the adopted LDP, which was subject to examination. There is only a minor alteration to the text of policy Re 7 compared to Policy Re 6 of the adopted LDP. The requirements of Criterion e in the Plan, which were previously set out in paragraph 251 of the adopted plan. The Council chose to include the provisions of paragraph 251 in Criterion e in order to ensure the provisions are more transparent and to ensure consistency in decision making. It is important that the requirements of criterion e are understood and paragraph 3.266 of the Plan sets this out clearly, which is to support small scale convenience stores in the context of creating more sustainable communities, i.e. 20 minute neighbourhoods. These small scale proposals do not have to meet the requirements of criterion b, but they do have to meet the requirements a, c and d. **No modification proposed.**

Proposals for retail in an out of centre location have to meet criterion a-d of the policy except for proposals less than 250sqm, which don't have to meet the requirements of criterion b. Criterion a. sets out four mutually exclusive scenarios that proposals have to meet, i.e. that a proposal will address a quantitative deficiency, or a proposal will address a qualitative deficiency, or a proposal will meet the needs of a growing residential population, or a proposal will meet the needs of a growing working population. As long as a proposal demonstrates it meets one of the scenarios in criterion a, it is considered to be in accord with that first criterion. Where a proposal is larger than 250sqm then clearly criterion e does not apply. **No modification proposed.**

The Council does not agree that criterion e contradicts criterion a to d. Criterion e only applies to proposals that are less than 250sqm and paragraph 3.266 explains this clearly. No modification proposed, however, should the reporter be so minded the policy could be altered to remove criterion e and to rely on the provisions within the supporting text as per the adopted LDP if it is considered to provide more clarity.

The Council disagrees that paragraph 3.265 contradicts the wording of Policy Re 7. As explained above the four mutually exclusive scenarios referred to relate to criterion a. No modification proposed, however, should the reporter be so minded the second sentence of the paragraph could be modified to state "Criterion a of the policy sets out four mutually exclusive scenarios.." if it is considered to provide more clarity.

Juniper Green & Baberton Mains Community Council (0306)



The Council has addressed these matters in its response to 0003 above. **No modification proposed.**

Living Streets Edinburgh Group (0486)

Criterion d of the Policy already requires proposal sites to be easily accessible and if not to be made easily accessible by sustainable transport modes. As a result, the Council does not consider an additional reference is required. **No modification proposed.**

Avison Young for Aldi Stores Ltd. (0526)

The Council has addressed matters relating to criterion e in its response to 0181 above.

The Council considers the explanatory text in paragraph 3.265 to be essential in order to provide clarification with regard to how the policy is implemented and to explain the provisions and criterion of the policy. The Council does not consider it pragmatic or reasonable to include such information, of direct relevance to the policy, within supporting planning guidance.

The Council considers reference to “Proposals seeking to meet the additional needs of a growing population should demonstrate that there are specifically meeting their needs and not the needs of existing population.” is reasonable and justified. New retail proposals should be of proportionate scale to meet the additional retail expenditure generated by the growing population. If a proposal is providing retail floorspace beyond the needs of the additional population, then an applicant would have to demonstrate that there is a retail deficiency (quantitative deficiency), otherwise the requirements of the criterion a policy will not be met. The Council considers this is reasonable, to ensure proposals are “of an appropriate type and proportionate scale that can justify an out of centre location” (paragraph 3.265). The Council does not consider the purpose of the policy is to stifle any future change but to ensure the national planning policy objective of town centres first is met, and that any proposals for retail in out of centre locations are fully justified. **No modification proposed.**

**Re 8 Alternative Use of Shop Units in Other Locations**

Leith Central Community Council (0614)

Policy Re 8 is largely the same as Policy Ret 10 in the adopted LDP. The Council considers there is balance to be struck between protecting existing individual convenience stores or small parades of shops and allowing the normal functioning of the market, where businesses come and go as part of market trends. Policy Re 8 sets out a range of criterion and seeks to prevent loss of shop units in certain circumstances as defined in the policy. Paragraph 3.268 makes reference to Leith where commercial uses outwith local centres are considered to make a positive contribution to the vibrancy of the city. The Council considers the Policy Re 8 strikes the right balance. **No modification proposed.**

Edinburgh World Heritage (0339)

The only policy applying to speciality shopping streets is policy Re 8. The supporting text in paragraph 3.267 provides further detail on these streets and more detailed information

on the relevant frontages is set out in Appendix B. The Council considers further clarity is unnecessary. **No modification proposed.**

## **Re 9 Entertainment, Leisure and café/restaurant Developments: Preferred Locations**

### Crosswinds Development Ltd (0184)

The Council does not agree that Table 14 should be amended to identify a town/local centre on the Crosswinds site (H61) for the reasons set out in the Council's response to 0184 under Re 1.

The Council considers the Plan should be read as a whole. Delivering a network of 20 minute neighbourhoods is a key underlying aim of the plan (aim 1). Whilst the proposed modification draws attention to this aim, in the context of policy Re 9, it does not materially change the requirements of the policy. As a result, the Council does not have any objection to it, however, nor does it consider it necessary. **No modification proposed.**

### Leith Central Community Council (0614)

The Council considers the issue of noise is an important planning consideration, particularly in the context of residential amenity, with regard to these issues. However, the type of assessment required is a matter for the development management process and therefore the Council considers it is unnecessary for the policy to specifically identify the assessment required. **No modification proposed.**

### Cockburn Association (0777)

The Council considers the issue of noise is an important planning consideration, particularly in the context of residential amenity, with regard to these issues. However, the type of assessment required is a matter for the development management process and therefore the Council considers it is unnecessary for the policy to specifically identify the assessment required. **No modification proposed.**

### Terry Levinthal (313)

The Council welcomes the support for the policy. The definition of what is "acceptable" will depend on the individual circumstances of the proposal, the likely impacts and what mitigation measures are proposed. As a result, this is a matter for the Development Management process, and it would not be feasible to provide specific details within the plan. **No modification proposed.**

## **Re 10 Entertainment, Leisure and café/restaurant Developments: Other Locations**

### Archie Clark (0003)

Policy Re 10 is largely the same as Policy Ret 8 in the adopted LDP (CD039). Its purpose is to set out policy with regard to proposals for entertainment, leisure and restaurants. The Council considers the Plan should be read as a whole. Matters related to the arts are addressed in Policy Econ 1, which is supportive in principle of proposals related to culture as defined in paragraph 3.231. As a result, the Council considers a reference to the arts

in Policy Re10 is unnecessary. Furthermore, if Policy Re 10 was altered policy Re 9 would also have to be altered to match. **No modification proposed.**

Crosswinds Development Ltd (0184)

The Council considers the Plan should be read as a whole. Delivering a network of 20 minute neighbourhoods is a key underlying aim of the plan (aim 1). Whilst the proposed modification draws attention to this aim, in the context of policy Re 9, it does not materially change the requirements of the policy. As a result, the Council does not have any objection to it, however, nor does it consider it necessary. **No modification proposed.**

Juniper Green & Baberton Mains Community Council (0306)

The Council has set out its position with regard to this point in its response to 0003 above. **No modification proposed.**

T Klan (0307)

Policy Re 10 is largely the same as Policy Ret 8 in the adopted LDP (CD039), which has been subject to examination. Its purpose is to set out policy with regard to proposals for entertainment, leisure and restaurants. In contrast Policy Re 5 sets out policy with regard to proposals for retail development and proposals for change of use of retail units. The two policies address different uses and therefore its only reasonable that the policies differ to take account of the different planning issues they raise. There is no requirement to take account of the quantum impacts of new restaurant or entertainment proposals and the Council has not encountered any difficulties in determining planning applications in this respect since the LDP was adopted. The proposal to delete reference to “in the urban area” will not assist the application of this policy as it is intended to apply to the urban area only. The alteration could result in proposals being brought forward for entertainment purposes in the green belt which would be in accord with the revised policy but inconsistent with the green belt policy Env 18. As a result, the Council considers the suggested change is unreasonable. **No modification proposed.**

Living Streets Edinburgh Group (0486)

The Council considers the reference to “sustainable transport” has a useful degree of flexibility to cover a range of transport modes and also future proofs the policy in terms of new emerging sustainable transport solutions. **No modification proposed.**

Cockburn Association (0777)

The Council welcomes the support for the policy. The Council considers it is a matter for the Development Management process to decide what data is required to determine what constitutes “a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents.” Much will depend on the individual circumstances of the application and decisions will have to be made on a case by case basis. **No modification proposed.**

**Re 11 Food and Drink Establishments**

New Town & Broughton Community Council (0254)

The Council's Guidance for Businesses (CD050) identifies areas of restriction where there will be a presumption against new public houses and entertainment venues on page 10. The plan shows Broughton Place and Picardy Place form part of an area of restriction. As a result, the Council considers the references to these streets in the Plan is factually correct. **No modification proposed.**

Scottish Government - Planning and Architecture Division - Development Plans Team (0309)

The Council notes the reference to health and wellbeing in the draft NPF4 (CD099). Until it is approved there is the possibility it may be changed from its current form. However, in the circumstances where it is not altered and should the reporter be so minded the policy could be altered to replace the text "living conditions" with "the health and well being" if it is considered to be more consistent with the approved NPF. **No modification proposed.**

Cockburn Association (0777)

The Council welcomes the support for the policy. The Council considers it is a matter for the Development Management process to decide what data is required to determine what constitutes "a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents." Much will depend on the individual circumstances of the application and decisions will have to be made on a case by case basis. **No modification proposed.**

## **Appendix B**

Nuveen Real Estate (0564)

The Council acknowledges that in Appendix B the addresses against 'City Centre Retail Core' under the 'Town Centres' section of this table with regard to the new St James Quarter are now out of date. The Council has no objection to a minor correction should the reporter/s be minded to alter the plan accordingly. Minor non-notifiable modification proposed.

## **Retail Strategy**

Brian Tiplady (0641)

The Council in preparing the Plan commissioned consultants to prepare a Commercial Needs Study Retail Paper (CD033). A summary of the conclusions of the study are set out in paragraphs 2.143 to 2.148 of the Plan. The evidence from the report shows that Edinburgh is more robust than many other cities in the UK and is well placed to deal with the consequences of changes in retail trends. The growing population will to a certain extent help to offset the fall in retail expenditure.

The retail strategy set out in the plan has sought to provide a careful balance between supporting the existing retail provision whilst providing more flexibility to allow more non-retail uses within centres without compromising their retail function and their vitality. One example of this increased flexibility is the alterations made to Policy Re 4 Alternative Use of Shop Units in the City Centre and Town Centres. Policy Re 4 sets out policy with

regard to proposals for change of use of a shop unit to a non-shop use in the city centre and town centres. The policy allows changes of use where they will not undermine the retailing function of the centre and where it is an appropriate use. The Council has prepared individual planning guidance for the centres which are tailored to their individual characteristics in order to guide decisions making with regard to assessing whether a proposal will undermine the retail function. However, the Council has acknowledged the way town centres are changing and the impacts of on-line shopping by altering Policy Re 4 from the previous policy Ret 9 in the adopted LDP. The new policy is more flexible and uses supplementary guidance as a material consideration, whereas the previous policy used statutory guidance directly to determine proposals. As a result, the Council considers the new policy strikes a healthy balance by being more supportive of a complementary range of uses within the city centre, whilst still preserving the importance of its retail function. In addition, the Council has recently adopted updated City Centre Supplementary Guidance (CD046) in January 2020. The updated guidance significantly changes the policy position particularly for Princes Street where it allows up to a third of the units within each block to change to non-shop use. The previous guidance (CD150) adopted in February 2014, in contrast, only allowed a change of use on Princes Street to Class 3 food and drink where it was in a location that could accommodate outdoor seating and the unit was under 500 sq m. The Council considers the change in policy and guidance is radical, and given the new guidance was introduced during Covid 19 it will take time for the consequences of this change to be realised. However the Council is committed to regular review of the guidance. As a result, the Council considers the Plan is acknowledging the changing retail trends, and has amended policy accordingly. However, it has amended policy in a measured way, by continuing to support the retail functions of centres in the context of a rising population, whilst allowing more flexibility for a range of uses within them to maintain and support their vitality.

With regard to the commercial centres the Council has also altered the policies in the plan, to encourage a broader range of uses within them. Policy Hou 1 now supports housing development, Policy Econ 3 supports office development and Policy Econ 6 supports hotel development, in principle, on commercial centres which will help to support them, and meet the aim (aim 1) of the plan to deliver 20 minute walkable neighbourhoods through the creation of high quality, high density, mixed use and walkable communities. **No modification proposed.**

#### Avison Young for Aldi Stores Ltd. (0526)

The Council in preparing the Plan commissioned consultants to prepare a Commercial Needs Study Retail Paper (CD033). A summary of the conclusions of the study and its implications for the retail strategy are set out in paragraphs 2.143 to 2.148 of the Plan. The purpose of the report was to provide an up to date evidence base and to inform the preparation of the plan. The Council considers it important that a summary of the findings of the report are set out in the strategy section of the plan to set the context for the retail strategy. The Council has not included the detailed findings of the study within the retail policies of the plan, nor is there any reference to the study in the retail policies. The Council does not agree the retail policies, particularly Re7, rely on the findings of the Commercial Needs Study, nor are unnecessarily restrictive. In addition, the Council emphasises that the provisions of Re7 are largely unchanged from Policy Ret 6 of the adopted LDP. **No modification proposed.**

#### Leith Central Community Council (0614)

The Council acknowledges that the sentence in 2.141 “In Edinburgh, shopping and leisure uses are mainly provided in a network of centres distributed across the city.” is repeated twice. The Council acknowledges there is a technical error that should be corrected as a minor drafting/technical matter.

**Reporter’s conclusions:**

**Reporter’s recommendations:**

Issue 39	Other Matters Raised – Consultation, Engagement and Representation	
Development plan reference:	Process	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Archie Clark (0003) Barratt David Wilson Homes (0677) BDW Trading (0350) BDW Trading (0678) CALA Management Ltd (0465) David McGowan (0168) Dr Helen Forest (0315) Hallam Land Management (0599) Hallam Land Management (0615) Homes for Scotland (0404) Juniper Green &amp; Baberton Mains Community Council (0306) Lennie O'Hara (0027)</div> <div>Miller Homes Limited (0649) Murray Estates (0197) Persimmon Homes (0495) Robertson Residential Group Limited (0490) Rosebery Estate (Bankhead) (0618) SEEDCo (0198) Steve Loomes (0767) Stewart Milne Homes (0118) Stirling Developments Limited (0303) Tarmac (0244) Taylor Wimpey (0200) Wright PDL (0078)</div>		
Provision of the development plan to which the issue relates:	Representations relating to consultation, engagement and representation process of the plan.	
Planning authority's summary of the representation(s):		
<div>General</div> <div><u>Archie Clark (0003)</u>  Format for consultation exceptionally difficult to use. It discriminates against those who do not have access to the internet.  The period to review and comment on the large document is not encouraging and more thought could have been given to enable more people to discuss and respond to the Plan.  <u>Barratt David Wilson Homes (0677)</u>  Minimal cognisance has been paid to representations made at Choices stage. A lack of reasoning is available to explain the decisions made.  <u>David McGowan (0168)</u>  City does not consult in an effective way and should sort out existing problems before moving forward. Plan is not in tune with residents.</div>		

Dr Helen Forrest (0315)

Concerned how little this plan has been advertised to the general public.

Juniper Green & Baberton Mains Community Council (0306)

Community Councils are not able to review 1400-page documents of this complexity and specialised nature and require more support to aid them in responding to LDPs.

Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

Little attention paid appears to have been paid to comments received at the Choices stage. A lack of reasoning is available to explain the decisions made.

Lennie O'Hara (0027)

The website to provide comment is poor.

Wright PDL (0078)

Disappointed at 6 week consultation period and that supporting evidence to justify the Council's strategy has been so limited.

**Place 16: West Edinburgh**

Crosswind Developments Ltd (0184)

Question the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG. This is a process point rather than a principle point and we are concerned that limited transparency of the process will undermine the outcomes noted in the plan. For example we note that this change of emphasis from economic development to housing led development is contrary to the current National Planning Framework (NPF3).

Hallam Land Management (0615), Tarmac (0244)

There have been unacceptable changes in approach and philosophy for development in West Edinburgh since Choices report. The map on page 27 of the Proposed Plan, which identifies housing-led development, reflects in no way whatsoever the previously proposed map in the earlier Choices report, map 11. This reflects the inconsistency in approach and lack of joined up thinking between relevant stages in the Plan process. This change has not been supported or justified by additional supporting studies, nor has it been subject to proper consultation prior to being presented in the Proposed Plan.

**H61: Crosswind (Elements)**

Rosebery Estate (Bankhead) (0618)

Neither the potential public transport proposal (Ref: WE12), nor the proposed allocation from which it arises (land adjacent to H61), were included in the Choices Consultation and this is a significant, unwelcome change to the plan which we have had no contact from the Council in respect of. The Council has not mentioned to the owner, or their agent, that



they were considering imposing the landing point of a public transport corridor on to an allocated, recently serviced site with residential development in the process of being brought forward. This land is not available for the landing point of a potential public transport corridor and should be considered to have a landowner constraint and be removed as a viable option to be explored further at this stage. Under emerging Policy Env 2, this proposal may result in the refusal of consent for land adjacent to H61 as it would “compromise the effective development of adjacent ground”.

## **H62: Land adjacent to Edinburgh Gateway**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Proposal was not identified as a housing led development in relation to Choice 12 in the MIR. As shown on Map 11 – Area 2 West Edinburgh: the site is identified as employment land. Choice 14 Delivering West Edinburgh identifies that the two potential changes being:

- Remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses.
- Allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange.

It therefore cannot be included in the Proposed LDP as a housing proposal as it has not been subject to public consultation at a formative stage in the process.

Crosswind Developments Ltd (0184)

Question the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG. This is a process point rather than a principle point and we are concerned that limited transparency of the process will undermine the outcomes noted in the plan

## **H63: Edinburgh 205**

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

The re-allocation of strategic business sites at the International Business Gateway (Edinburgh 205) and Edinburgh’s Bioquarter to housing (9,500 homes) combined was not even identified as a ‘choice’ at the Main Issues Report stage of the City Plan.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Delete proposal H63: Edinburgh 205

Proposal was not identified as a housing led development in relation to Choice 12 in the MIR. As shown on Map 11 – Area 2 West Edinburgh: the site is identified as employment land. Choice 14 Delivering West Edinburgh identifies that the two potential changes being:

- Remove the safeguard in the existing plan for the Royal Highland Showground site

to the south of the A8 at Norton Park and the site allocated for other uses.

- Allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange.

It therefore cannot be included in the Proposed LDP as a housing proposal as it has not been subject to public consultation at a formative stage in the process.

#### Crosswind Developments Ltd (0184)

Question the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG. This is a process point rather than a principle point and we are concerned that limited transparency of the process will undermine the outcomes noted in the plan

#### SEEDCo (0198)

Proposal should be removed from the Plan until such time as it has undergone proper assessment and consultation: The Proposed City Plan departs from all of the housing delivery options identified in Choices. It does not allocate Area 1 or any of the other greenfield Areas identified in Options 2 and 3. Nor does it restrict the housing allocations to the brownfield sites identified in Option 1 of page 33 of Choices. Instead, Option 1 has been supplemented to allocate greenfield housing sites at the previously undeveloped employment allocations at the IBG (Edinburgh 205) and Bioquarter for housing. Therefore, neither of these proposals were subject to consultation at the MIR stage. We object to the process by which the decision has been taken by the Council to re-allocate these greenfield sites for predominantly residential development without consultation.

#### Stirling Developments Limited (0303)

Indicated that H63 proposes 7000 units on what appears to be a greenfield site that was not identified through the Choices document.

#### **BioQuarter**

BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Hallam Land Management (0599), Hallam Land Management (0615), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

The approach to reallocating strategic business land to housing was not consulted upon at MIR stage.

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

The re-allocation of strategic business sites at the International Business Gateway (Edinburgh 205) and Edinburgh's Bioquarter to housing (9,500 homes) combined was not even identified as a 'choice' at the Main Issues Report stage of the City Plan.

## **Modifications sought by those submitting representations:**

### **General**

Barratt David Wilson Homes (0677), David McGowan (0168) Dr Helen Forrest (0315), Juniper Green & Baberton Mains Community Council (0306), Homes for Scotland (0404), Steve Loomes (0767), Lennie O'Hara (0027), Wright PDL (0078)

No modification specified.

Wright PDL (0078), Steve Loomes (0767), Homes for Scotland (0404)

No modification specified.

Barratt David Wilson Homes (0677)

No modification specified.

### **Place 16: West Edinburgh**

Hallam Land Management (0615), Tarmac (0244)

No modifications specified but it is indicated that this section on West Edinburgh needs a complete review and clear justification before any decisions on a finalised plan is made.

Crosswind Developments Ltd (0184)

It is indicated that representee questions the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG.

### **H61: Crosswind (Elements)**

Rosebery Estate (Bankhead) (0618)

Delete the annotation on Maps 2 & 8, and all other references relating to the West Edinburgh Transport Improvements (WE12) in so far as they show a potential connection from the new addition to Place 16 adjacent to H61 linking over the railway into the Maybury (Place 22/HSG19) housing allocation being carried forward from the LDP.

Remove the new land allocation adjacent to H61 identified in Place 16 and its associated potential public transport link (WE1).

The following development principles should be deleted:

- “m) Address the transport infrastructure mitigation requirements at Maybury junction, Barnton junction and Craigs Road Junction and support delivery of the bus priority and interchange recommendations that emerge from the on-going West Edinburgh Transport Improvement Programme study.” Transport Contribution Zone (Para 3.59) should only apply to those sites in Place 16/West Edinburgh allocated in this document, not sites being brought forward from the LDP which are in the

process of being delivered.

### **H62: Land adjacent to Edinburgh Gateway**

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

No modification specified but it is indicated that H62 should be removed from the plan.

Crosswind Developments Ltd (0184)

It is indicated that the representee questions the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG.

### **H63: Edinburgh 205**

BDW Trading (0350), BDW Trading (0678), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

No modification specified but it is indicated that H63 should be removed from the plan.

CALA Management Ltd (0465), Hallam Land Management (0599), Miller Homes Limited (0649)

Delete proposal H63: Edinburgh 205

Stirling Developments Limited (0303)

No modification specified but it is indicated that H63 proposes 7000 units on what appears to be a greenfield site that was not identified through the Choices document.

SEEDCo (0198)

H63 should be removed from the plan.

Crosswind Developments Ltd (0184)

It is indicated that the representee questions the consultation approach to date on the removal of economic development as a priority from the sites formally known as IBG.

### **H86: BioQuarter**

BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Hallam Land Management (0599), Hallam Land Management (0615), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Stewart Milne Homes (0118), Taylor Wimpey (0200)

No modification specified but infers removing reference to housing on the site.

### Summary of responses (including reasons) by planning authority:

#### General

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), Lennie O'Hara (0027)

On accessibility, the Council's consultation hub has been used successfully by a range of Council services for many engagement exercises. The format used on the hub followed the order of the Proposed Plan to allow users to follow it through logically. The Council offered on line and telephone assistance for those wishing to respond but were unable to access the hub directly. Further details are set out in the Report of Conformity with the Participation Statement (CD021). **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), David McGowan (0168), Wright PDL (0078)

On the timescale of the Representation Period, this was for six weeks in accordance with statutory requirements. Further details are set out in the Report of Conformity with the Participation Statement (CD021). **No modification proposed.**

Archie Clark (0003), Juniper Green & Baberton Mains Community Council (0306), David McGowan (0168), Dr Helen Forrest (0315)

On publicising the Proposed Plan for Representation a number of activities, as set out in the Report of Conformity with the Participation Statement (CD021), were carried out to raise awareness of the Plan. Notification was provided to organisations, groups and individuals on the project mailing list. Hard copies of documents were provided to Community Councils and public libraries. Statutory notification was provided by advert in the Edinburgh Evening News and by statutory neighbour notification. The Proposed Plan and supporting documents were available on the Council website along with a proposals map and the supporting documents. The Representation stage is to provide those who feel the plan should be changed in some way the opportunity to express this and for their views to be part of the Examination process if unresolved.

Earlier in the process Choices for City Plan was the statutory consultation stage in the preparation of the Proposed Plan. The Report of Conformity with the Participation Statement (CD021) sets out the activities carried out at that stage. As the consultation period for this was affected by the Covid-19 pandemic and associated restrictions, the Council publicised that it would accept responses for a further month after the previously advised end date. Within this period 8 drop-in sessions were provided to allow opportunity to find out more about consultation proposals, staffed exhibitions were held in public places to raise awareness and consultation hub surgeries held to enable people to ask detailed questions and complete the survey online. **No modification proposed.**

David McGowan (0168)

On addressing existing issues, the purpose of the Plan is to set the strategy, policies and

land use allocations for future development. In developing the Plan, account is taken of existing issues through the Monitoring Statement (CD023). The majority of comments made during the statutory consultation period were supportive of the aims, objectives, policies and proposed land use principles to be taken forward in the Proposed Plan along with the approach to taking forward existing undeveloped sites from the LDP 2016 and new allocations proposed. **No modification proposed.**

Barratt David Wilson Homes (0677); Homes for Scotland (0404), Steve Loomes (0767), Wright PDL (0078)

On the consideration of consultation responses, subsequent to conclusion of the Choices Main Issues Report consultation, an overview of the consultation responses (CD022) was reported to the Council's Planning Committee. The majority of comments made during the statutory consultation period were supportive of the aims, objectives, policies and proposed land use principles to be taken forward in the Proposed Plan along with the approach to taking forward existing undeveloped sites from the LDP 2016 and new allocations proposed. This was used to inform the Proposed City Plan 2030 as reported to Planning Committee in September 2021 (CD009). The Council considers that there are clear links between the options supported through the consultation and the strategy and policies of the plan. **No modification proposed.**

Wright PDL (0078)

On evidence to support the plan, both the statutory Choices Main Issues Report Stage and the statutory Proposed Plan Representations stage were supported by all required statutory documents and a wide range of non-statutory supporting documents. The Council considers that an appropriate evidence base was defined, used and made available for comment at consultation and representation stages. **No modification proposed.**

### **Place 16: West Edinburgh**

Crosswind Developments Ltd (0184), Hallam Land Management (0615), Tarmac (0244)

The Council disagrees that the approach set out for Place 16: West Edinburgh was not adequately consulted on. Nor does it agree that it constitutes the 'removal' of economic development as a priority.

Before preparing the Proposed Plan the Council had a statutory duty in terms of Section 17 of the Town and Country Planning (Scotland) Act 1997 (CD101, the "1997 Act") to produce and consult upon a single Main Issues Report (CD022, Choices for City Plan 2030). As with any Report, to be properly understood it must be read & considered on its whole terms.

The site was previously allocated for development through the development plan process. The MIR made clear in Choice 13 and Choice 14 that the consultation included for review of the site and its EMP 6 policy allocation. The introduction to Choice 14 makes clear the infrastructure attributes of the area, including the existing tramline. Choice 14 A makes clear the desire to make best use of public transport infrastructure in the area and accommodate a mix of uses to support inclusive sustainable growth. The uses proposed include housing amongst others.

Choice 2 B set out the preferred option for policies on density to ensure best use of the limited space in the city with a minimum of 65 dwellings per hectare on all sites and, where identified in the plan, higher density housing development with a minimum of 100 dwellings per hectare and a vertical mix of uses to support the efficient use of land. This is to provide for and to maximise the benefits of being close to public transport services and along high-quality active travel routes, provided that the design of such developments is of a high quality, respects amenity, and is of an appropriate character.

Choice 10 B set out provision for a new policy framework to set out a requirement for housing on all sites over 0.25 hectares coming forward for development of student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. There are some caveats to this.

Choice 12 sets out housing supply targets, housing land supply and potential housing sites with:

- a preferred strategy, Option 1 Urban Area Sites and shown on Map 7 including the Crosswinds site;
- a reasonable alternative, Option 2 Greenfield land and shown on Map 9 and including the IBG and Crosswinds sites; and
- a further alternative, Option 3 Blended Approach with Urban Area and Greenfield Sites and including IBG and Crosswinds

The Council considers that within Choice 12 Map 11 - Area 2 shows the IBG land identified as employment land which, as set out in Choices 2 and 10, would require to be mixed use (including a vertical mix of uses) and include for high density housing on at least 50% of the site. This high density, mixed use approach is clearly set out on in Choice 12 page 38, preceding map 11, under the heading 'Uses'.

Other maps within Choice 12 show:

Map 7 - Option 1 Delivery by the Council and its partners within the Urban Area shows Crosswinds

Map 9 - Option 2 Delivery through market housing by releasing Greenfield and includes IBG and Crosswinds

Map 15 - All potential housing-led mixed-use sites, a range of which could form Option 3 a blended approach, shows IBG and Crosswinds

Additionally mapping in other sections of Choices shows the following:

Choice 13

Map 16 - Areas of support for inclusive growth, innovation, universities, & culture includes IBG, Crosswinds and Bioquarter

Choice 14

Map 17 - Area of Search West Edinburgh includes IBG, Crosswinds and wider West

Map 19 – Crosswinds Runway Site

Map 21 - Strategic Office Locations shows IBG

Map 23 - Business and Industry Areas Map indicatively shows Crosswinds

The Council considers that Choices set out the review of the sites and that mapping and policies made clear the nature of that review as sufficient consultation on options for

development for IBG and the wider West Edinburgh area, and also through the Housing Study and Appendix D. The mapping of Choices, due to accommodating the statutory preferred and reasonable alternative approaches, is best done by the use of several maps. The Council considers that there is a strong relationship between the Choices mapping overall and the Housing Led Development Map on Page 27 of the Proposed Plan and that the housing led approach was consulted on.

In addition to this, the Council, in line with provisions of Section 16(2) of the Town and Country Planning (Scotland) Act 1997 (the “1997 Act”), considered the existing and emerging NPF, other information and considerations as prescribed, including consultation responses, and other information and considerations as appear to be relevant, in writing the Proposed Plan. In that context the emerging NPF4 was a relevant material consideration. The Proposed Plan had regard to emerging national spatial strategy and policies, as provided by the Scottish Government’s Position Statement on NPF4 (CD098), the Programme for Government 2021 (CD100) and by regional and local approaches through the interim Regional Spatial Strategy (CD093, approved by the SESplan Joint Committee, City Region Deal Joint Committee and ratified by the constituent authorities) and the emerging Wider West Edinburgh Spatial Strategy (CD149), as information and considerations for an emerging Local Development Plan in terms of the Act. In timing, it is appropriate that the Council plans with due regard for emerging policy and spatial considerations. The appropriateness of that approach is now underlined by the proposed removal of the NPF3 national development status for mainly business led development at IBG in draft NPF4 (CD099), and that policies on development, housing, density and mixed use and including for 20 minute neighbourhoods meant that the previous large scale, largely single use approach would be superseded in national policy requirements.

Responses to the Choices consultation (CD038) included reference to the potential for the type of development set out in the Proposed Plan, demonstrating how people understood what was being proposed.

The Covid 19 pandemic triggered significant shifts in working practices and the office and wider property markets. These changes further underlined the potential for the review of the IBG to adopt the approach set out in the Proposed Plan as an outcome of the review of the site and the policy considerations consulted on through Choices.

Therefore, the Council considers that when Choices is read as a whole, there is a clear central thread of a City wide housing led mixed development approach and that there was sufficient consultation on the specifics of the sites themselves. Choices clearly set out, that these sites were under review in terms of their existing 2016 LDP allocations, that they required to have significant housing allocations, and that those allocations would be high density and mixed use.

The Council notes that there was strong support for the preferred Choices as reported to Planning Committee (CD038) in advance of the consideration of the Proposed Plan.

The Council notes that on appointment the Reporter will, in terms of Section 19(4) of the 1997 Act, firstly consider the adequacy of the consultation, and that if they consider further consultation to be required they have the power to recommend it to Scottish Ministers, in terms of Section 19A of the 1997 Act. **No modification proposed**



## **H61: Crosswind (Elements)**

### Rosebery Estate (Bankhead) (0618)

The objection to WE12 is noted. WE12 is identified in City Plan as a potential option. WE1 is currently being progressed in discussion with the redesign of Maybury Junction (R7). The Council considers that the criterion (m) should remain as it has been informed by the plan's Transport Assessment and is part of the ongoing West Edinburgh Transport Improvement Programme. **No modification proposed**

## **H62: Land adjacent to Edinburgh Gateway**

### BDW Trading (0678), CALA Management Ltd (0465), Crosswind Developments Ltd (0184), Hallam Land Management (0599), Miller Homes Limited (0649), SEEDCo (0198), Stewart Milne Homes (0118),

The Council disagrees that the approach set out for H62: Land adjacent to Edinburgh Gateway, formerly part of the IBG land, was not adequately consulted on. Nor does it agree that it constitutes the 'removal' of economic development as a priority.

Before preparing the Proposed Plan the Council had a statutory duty in terms of Section 17 of the Town and Country Planning (Scotland) Act 1997 (CD101, the "1997 Act") to produce and consult upon a single Main Issues Report (CD022, Choices for City Plan 2030). As with any Report, to be properly understood it must be read & considered on its whole terms.

See response for Place 16 West Edinburgh above, applicable to H62 as part of the IBG land. **No modification proposed**

## **H63: Edinburgh 205**

### BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Crosswind Developments Ltd (0184), Hallam Land Management (0599), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Stirling Developments Limited (0303), Taylor Wimpey (0200),

The Council disagrees that the approach set out for H63: Edinburgh 205 was not adequately consulted on. Nor does it agree that it constitutes the 'removal' of economic development as a priority.

Before preparing the Proposed Plan the Council had a statutory duty in terms of Section 17 of the Town and Country Planning (Scotland) Act 1997 (CD101, the "1997 Act") to produce and consult upon a single Main Issues Report (CD022, Choices for City Plan 2030). As with any Report, to be properly understood it must be read & considered on its whole terms.

See response to Place 16 West Edinburgh above, applicable to H63 as the main part of the IBG land (otherwise known as Edinburgh 205 or now as West Town).

### SeedCo (0198)

The Council's further assessment of the options set out in Choices is given in Issue 2: Spatial Strategy. The Council considers it has followed the preferred approach of the MIR stage which included the review of existing land allocations. **No modification proposed.**

#### Stirling Developments Limited (0303)

The Council considers its responses above together with Issue 20: Assessment of Housing Land Supply respond to this matter. **No modification proposed.**

#### **H86: BioQuarter**

BDW Trading (0350), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Taylor Wimpey (0200)

The Council's position on Aim 10 is set out in the response to Issue 1: Issues and Aims. The reallocation of strategic business land at BioQuarter to housing is an appropriate approach to promoting sustainable, high density mixed use development. **No modification proposed.**

BDW Trading (0350), BDW Trading (0678), CALA Management Ltd (0465), Hallam Land Management (0599), Hallam Land Management (0615), Miller Homes Limited (0649), Murray Estates (0197), Persimmon Homes (0495), Robertson Residential Group Limited (0490), SEEDCo (0198), Taylor Wimpey (0200)

The Council disagrees that the approach set out for the H86 Bioquarter site was not adequately consulted on. The site was previously allocated for development through the development plan process. The Main Issues Report (CD022, Choices for City Plan 2030) made clear in Choice 13 that the consultation included for review of the site and its EMP 2 policy designation.

Before preparing the Proposed Plan the Council had a statutory duty in terms of Section 17 of the Town and Country Planning (Scotland) Act 1997 (CD101, the "1997 Act") to produce and consult upon a single Main Issues Report. As with any Report, to be properly understood it must be read & considered on its whole terms.

Choice 2 B set out the preferred option for policies on density to ensure best use of the limited space in the city with a minimum of 65 dwellings per hectare on all sites and, where identified in the plan, higher density housing development with a minimum of 100 dwellings per hectare and a vertical mix of uses to support the efficient use of land. This is to provide for and to maximise the benefits of being close to public transport services and along high-quality active travel routes, provided that the design of such developments is of a high quality, respects amenity, and is of an appropriate character.

Choice 10 B set out provision for a new policy framework to set out a requirement for housing on all sites over 0.25 hectares coming forward for development of student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. There are some caveats to this.

The Council acknowledges that within Choice 12, Map 10 - Area 1 shows the BioQuarter

land identified as employment land which, as set out in Choices 2 and 10, would require to be mixed use (including a vertical mix of uses) and include for high density housing on at least 50% of the site. This high density, mixed use approach is clearly set out on in Choice 12 page 36, preceding map 10, under the heading 'Uses'.

Other maps within Choice 12 show:

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

Map 16 - Areas of support for inclusive growth, innovation, universities, & culture includes Bioquarter

The Council considers that Choices set out review of the site and mapping and policies that made clear the nature of that review as a sufficient consultation on options for development for the BioQuarter as identified through both the text and mapping of Choices, and also through the Housing Study and Appendix D. The mapping of Choices, due to accommodating the statutory preferred and reasonable alternative approaches, is best done by the use of several maps. The Council considers that there is a strong relationship between the mapping overall and the Housing Led Development Map on Page 27 of the Proposed Plan and that the housing led approach was consulted on.

In addition to this, the Council, in line with provisions of Section 16(2) of the Town and Country Planning (Scotland) Act 1997, considered the existing and emerging NPF, other information and considerations as prescribed, including consultation responses, and other information and considerations as appear to be relevant, in writing the Proposed Plan. In that context the emerging NPF4 was a relevant material consideration. The Proposed Plan had regard to emerging national spatial strategy and policies, as provided by the Scottish Government's Position Statement on NPF4 (CD098), the Programme for Government 2021 (CD100) and by regional and local approaches through the interim Regional Spatial Strategy (CD093, approved by the SESplan Joint Committee, City Region Deal Joint Committee and ratified by the constituent authorities, all relevant considerations for an emerging Local Development Plan in terms of the Act. In timing, it is appropriate that the Council plans with due regard for emerging policy and spatial considerations. The appropriateness of that approach is underlined by the proposed policies on development, housing, density and mixed use and including for 20 minute neighbourhoods which meant that the large scale, largely single use approach would be superseded in national policy requirements.

Responses to the Choices consultation (CD038) included reference to the potential for the type of development set out in the Proposed Plan, demonstrating how people understood what was being proposed.

The Covid 19 pandemic triggered significant shifts in working practices and the office and wider property markets. These changes further underlined the potential for the review of the BioQuarter to adopt the approach set out in the Proposed Plan as an outcome of the review of the site and the policy considerations consulted on through Choices.

Therefore, the Council considers that when Choices is read as whole, there is a clear central thread of a City wide housing led mixed development approach and that there was sufficient consultation on the specifics of the sites themselves. Choices clearly set out, that these sites were under review in terms of their existing 2016 LDP allocations, that they required to have significant housing allocations, and that those allocations would be high density and mixed use.

The Council notes that there was strong support for the preferred Choices as reported to Planning Committee (CD038) in advance of the consideration of the Proposed Plan

The Council notes that on appointment the Reporter will, in terms of Section 19(4) of the 1997 Act, firstly consider the adequacy of the consultation, and that if they consider further consultation to be required they have the power to recommend it to Scottish Ministers, in terms of Section 19A of the 1997 Act. **No modification proposed**

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>