Planning Committee

9.00am, Wednesday, 12 August 2020

Choices for City Plan 2030 – Consultation Key Findings and Next Steps

Executive/routine	Executive
Wards	All
Council Commitments	1, 2, 4, 10, 11, 12, 18, 26

1. Recommendations

1.1 It is recommended that Committee:

1.1.1 notes the level of response to, and the key findings of, the consultation on Choices for City Plan 2030 as summarised in this report and set out in Appendix 1;

1.1.2 notes the additional month in which the Council accepted responses to the consultation as a response to the Covid-19 crisis and lockdown measures put in place by the UK and Scottish Governments in the weeks before the consultation end date of 30 March 2020;

1.1.3 notes the need to consider the consultation findings in full and come to a "settled view of the Council" on the strategy, sites and policy content of City Plan 2030 as a proposed Local Development Plan (LDP) to be reported back to Committee as set out in the revised Development Plan Scheme (Appendix 2);

1.1.4 notes the technical work that requires to be carried out to prepare the Proposed Plan for Committee consideration and Examination in Public as key stages in the process before a plan can be considered for adoption, and the need to consider impacts of Covid-19 measures and effects on this technical work; and

1.1.5 agrees an updated Development Plan Scheme as set out in Appendix 2 to this report.

Paul Lawrence

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Report

Choices for City Plan 2030 – Consultation Key Findings and Next Steps

2. Executive Summary

2.1 The purpose of this report is to bring before Committee the key messages emerging from the public consultation on Choices for City Plan 2030, the statutory main issues report for City Plan 2030 (the next Local Development Plan (LDP) for Edinburgh), the next steps required to proceed, including technical work and consideration of the impact of measures to control Covid-19 and to approve a revised Development Plan Scheme which sets out the changed timescales for the Proposed Plan, period of representation, Examination and adoption.

3. Background

3.1 Local authorities have to prepare LDPs for their areas and keep them up to date. LDPs should not be older than five years. The Council adopted its first LDP in November 2016. The replacement LDP is to be called City Plan 2030.

3.2 The City Plan 2030 project commenced in 2018. At its meeting of 30 May 2018 the Planning Committee received a report which provided an overview of the project.

3.3 The report set out the overall objectives for the project, including alignment with the wider strategic context for the Council and its partners. There are several other projects and strategies being progressed or implemented in parallel with the City Plan 2030. Project work since May 2018 has sought to ensure that these projects inform and are informed by City Plan 2030.

3.4 It also identified some of the main requirements and constraints on the project. These include statutory requirements, which must be met if the Council is to adopt City Plan 2030 and avoid a successful legal challenge.

3.5 It is important that all stakeholders, including individual members of the public and community groups, have opportunities to influence the content of a LDP. There are several stages in the preparation process when people can make statutory written representations to the Council. The consultation on Choices for City Plan 2030 was the first of those.

4. Main report

Project Timetable

4.1 The project timetable has been influenced by the Scottish Ministers' consideration and rejection of Strategic Development Plan (SDP) 2 for South East Scotland. By law, City Plan 2030 must be consistent with the approved SDP. In rejecting SDP 2 the Scottish Ministers referred the SESplan local authorities to SDP 1 as the approved SDP. The choices regarding spatial strategy and policy are influenced by this but the scale and type of growth which City Plan 2030 must plan for has to be considered with reference to SDP 1 along with other emerging material considerations. Recent appeal decisions have placed little weight on the content of SDP 1.

4.2 The project timetable was also influenced by the calling of a UK General Election for 12 December 2019 and the additional month allowed for submission of responses to Choices.

4.3 The timetable for subsequent stages of the project has been updated in the Development Plan Scheme (Appendix 2). This has considered the effects of the ongoing Covid-19 emergency on the consultation process and the technical work required to support the Proposed Plan. It is now intended to bring a Proposed Plan to Committee in December 2020.

4.4 In particular, a key piece of technical work is the Transport Assessment. Up to date assumptions of the levels of public transport use, private car use and active travel are difficult to assess at this time and there is a likelihood that this uncertainty will continue for some time, making reasonable assessments difficult. Officers are working with the Scottish Government, Transport Scotland and consultants to understand this issue.

4.5 Similarly, the longer-term impacts of the current emergency on the economy and employment and the effect of this on construction rates and mortgage-ability in the housing market are not yet fully understood and a range of commentaries on these factors do not show consistency. This is particularly important where the Council is expected to set ambitious housing targets and allocate a generous housing land supply and where if those targets are not met, the housing industry can pursue a case that more land is required for developers to fulfil demand.

4.6 It is likely, however, that the impacts will increase the need for affordable housing above the already high levels.

4.7 As delays in the plan process could add to the risk of exposure to the Scottish Planning Policy (SPP) considerations of not having an up to date development plan (plans should be less than five years old), not having a clear, effective five year housing land supply and thereby invoking the SPP presumption in favour of development which constitutes sustainable development according to SPP criteria, they should be avoided.

4.8 Officers have been in discussion with the Scottish Government as to the potential to relax these provisions of SPP in the circumstances, akin to the extensions of planning

permission and other consents that the government has legislated for. On July 17 2020 the Scottish Government issued a consultation ([Scottish Planning Policy and Housing - Technical Consultation On Proposed Policy Amendments](#)) proposing the removal of the presumption in favour of development which constitutes sustainable development and to clarify how an effective five year housing land supply be calculated, to inform decision making. This is in response to the Covid-19 emergency and a Court of Session decision on the 'tilted balance' in respect of the presumption, which the Scottish Government considers does not reflect how it considers this part of SPP should operate. The consultation closes on 9 October 2020 and a proposed response to it will be presented to Elected Members prior to submission.

4.9 Whilst an LDP has a 10-year period, there is a requirement to review it within five years. It may be the case that a review needs to be made earlier than that if there is a significant change in circumstances, however, that review would need to progress on the basis of the relevant legislation. In the timescales of this plan, that would likely be under the revised LDP process of the Planning (Scotland) Act 2019.

Supporting Documents and Studies

4.10 The relevant legislation and both national and regional planning policy set several requirements on how an LDP is prepared. In particular, strategic environmental assessment is required and is also consulted on. The committee report on Choices lists these in full and a link is provided to this as a background document.

Choices for City Plan 2030 – Consultation Responses Key Findings

4.11 The Choices for City Plan 2030 consultation received over 1,800 responses. This compares to some 435 received at the same stage for the Main Issues Report which led to the current LDP. The figure includes petitions in relation to potential for development sites at Kirkliston and at the Inch Nursery in South Edinburgh. The City Mobility Plan consultation which ran jointly with it also received some 1,800 responses.

4.12 In respect of the consultation responses, the report and Appendix 1 do not attribute the response, other than to highlight those of key government, government agency, transport bodies and development industry bodies at 4.21 below. As set out in Appendix 1 the comments are set out so as to give a clear account of views on Choices. The full responses, with personal data removed where required by data protection legislation, can be viewed on the Council's website at https://www.edinburgh.gov.uk/cityplan2030.

4.13 Neither the report or Appendix 1 make comment on the responses or how they should be considered. The proposed plan stage will include commentary on how the responses have been taken into account in writing the proposed plan.

4.14 Social media statistics demonstrate that the consultation reached over 26,000 people, with over 1 million impressions (views, likes, engagement) on Facebook, LinkedIn and Twitter.

4.15 The Main Issues Report, Choices for City Plan is structured around four outcomes as follows:

    4.15.1   a sustainable city which supports everyone's physical and mental well-being;

    4.15.2   a city in which everyone lives in a home which they can afford;

    4.15.3   a city where you don't need to own a car to move around; and

    4.15.4   a city where everyone shares in its economic success.

4.16 From these outcomes there are 16 main choices, grouped under the above themes, as summarised in the following diagram:

A sustainable city which supports everyone's physical and mental wellbeing	A city in which everyone lives in a home which they can afford
1. Making Edinburgh a sustainable, active and connected city 2. Improving the quality, density and accessibility of new development 3. Delivering carbon neutral buildings 4. Creating place briefs and supporting the use of Local Place Plans in our communities	9. Protecting against the loss of Edinburgh's homes to other uses 10. Creating sustainable communities 11. Delivering more affordable homes 12. Delivering our new homes and infrastructure
A city where you don't need to own a car to move around	**A city where everyone shares in its economic success**
5. Delivering community infrastructure 6. Creating places that focus on people, not cars 7. Supporting the reduction in car use in Edinburgh 8. Delivering new walking and cycle routes	13. Supporting inclusive growth, innovation, universities and culture 14. Delivering West Edinburgh 15. Protecting our city centre, town and local centres 16. Delivering office, business and industry floorspace

4.17   The key policy changes, as set out in Choices, are summarised below with an indication of the levels of consultation support or otherwise, with the fuller details in Appendix 1.

4.18   In filling out the questionnaire on Choices, respondents could choose to answer all or any of the questions and support or object to individual choices. Therefore, not all 1800 respondents answered all questions. The percentages given below and in the Appendix are calculated on the basis of the number of people answering that question rather than as a percentage of the total number (1800) of responses. The number of responses for and against is therefore given in brackets for clarity as to the level of response and support/objection for each individual question.

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

4.18.1   Choice 1 - Making Edinburgh a sustainable, active and connected city – this choice included policy changes to deliver a city-wide green network, to require development to deliver blue and green infrastructure, water management, the use of open space, allotments and cemetery provision. This choice had a very high level of support from those who responded, with most choices receiving above 80% support, with those relating to the city-wide network and water management requirements receiving over 90%.

Choice 1 - Making Edinburgh a sustainable, active and connected city		
Choice	Policy change	% support overall
1A	City wide green network	92% (837/68)
1B	Onsite blue and green infrastructure	90% (805/88)
1C	Water management	96% (826/36)
1D	Poor quality or underused open space	82% (699/153)
1E	Extra-large greenspace standard	83% (726/146)
1F	New allotment sites	89% (766/96)
1G	New cemetery sites	76% (617/199)
1H	Open space maintenance – new requirement	87% (732/107)

4.18.2   Choice 2 - Improving the quality, density and accessibility of development – this choice included policy changes to ensure improvements in the design of new development in Edinburgh, including the use of design statements to set out the sustainability of developments, a minimum design requirement and a requirement for new developments to deliver active travel and usable open space. All but one choice received above 80% support. The choice on density received some level of objection, with most responses stating that a minimum of 65 dwellings per hectare was too high.

Choice	Policy change	% support overall
2A	Expanded design statements	90% (724/82)
2B	Minimum density	64% (517/288)
2C	New development to deliver active travel	85% (682/116)
2D	New development to deliver open space	87% (685/102)

4.18.3 Choice 3 - Delivering carbon neutral buildings – this choice set out a new requirement for buildings in Edinburgh to meet the platinum standard in Scottish Building Regulations, Gold, Silver and Bronze were also consulted upon. 62% of responses supported the Platinum standard.

Choice 3 - Delivering carbon neutral buildings		
Choice	Policy change	% support overall
3	Platinum standards	63% (469) (Gold 135/Silver 51/Bronze 89)

4.18.4 Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities. Of the responses received, 90% supported the use of place briefs to help deliver new developments within Edinburgh.

Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities		
Choice	Policy change	% support overall
4A	Place briefs - new requirement	93% (715/51)

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

4.18.5 Choice 5 - Delivering Community Infrastructure – this choice considered policy changes to how we deliver community infrastructure, including a new infrastructure first policy and the way we collect developer contributions.

Choice 5 - Delivering Community Infrastructure		
Choice	Policy change	% support overall
5A	Infrastructure first approach	92% (702/64)
5B	New community facilities – in plan	95% (735/35)
5C	Co-location of services in local communities	93% (713/53)
5D1	Developer contributions requirements – in plan	95% (708/40)
5D2	Use of cumulative contribution zones	79% (530/137)
5E	Stop using supplementary guidance for developer contributions	86% (575/90)

4.18.6 Choice 6 - Creating places that focus on people, not cars – this choice recommended the way we assessed new development in terms of a shift from cars to walking, cycling and wheeling. Most responses supported a new policy in the plan to deliver this change and a large proportion supported including this requirement being set out in place briefs.

Choice 6 - Creating places that focus on people, not cars		
Choice	Policy change	% support overall
6A	Modal shift – new policy	82% (679/147)
6B	Using place briefs to set modal shift targets	73% (580/218)

4.18.7 Choice 7 - Supporting the reduction in car use in Edinburgh – this choice sets out policy changes in relation to parking. There was strong support for cycle parking, parking for those with disabilities and electric vehicles and for park and ride sites. However, there was less support for setting parking levels in the city to encourage trips by walking, cycling and public transport.

Choice 7 - Supporting the reduction in car use in Edinburgh		
Choice	Policy change	% support overall
7A	Set parking levels in the city centre by targets for trips by walking, cycling and public transport	69% (554/244)
7B	Protect against new city centre parking	74% (581/202)
7C	Support parking for bikes, those with disabilities and EV	82% (650/146)
7D	New park and ride sites	89% (703/85)

4.18.8 Choice 8 - Delivering new walking and cycling routes. This choice looks at how we identify new cycle routes and where these routes should be. There was very strong support for all the proposed changes.

Choice 8 - Delivering new walking and cycling routes		
Choice	Policy change	% support overall
8A	Identifying new cycle routes	92% (740/68)
8B	New cycling routes – allocated	89% (724/86)
8C	New cycling routes – proposed sites, TA and Action Programme	87% (659/99)

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

4.18.9 Choice 9 - Protecting against the loss of Edinburgh's homes to other uses. This choice consulted on the designation of a 'short term control area' for Edinburgh and whether City Plan should have a policy to determine applications for planning permission for short term lets. There was strong support for both.

Choice 9 - Protecting against the loss of Edinburgh's homes to other uses		
Choice	Policy change	% support overall
9A	Short term let control area	87% (687/106)
9B	Short term let – new policy	88% (699/94)

4.18.10 Choice 10 - Creating sustainable communities. This policy choice consulted upon changes to our student housing policy, a requirement to deliver housing on all sites coming forward over a certain size and the better use of standalone supermarket sites. All three policy proposals received support.

Choice 10 - Creating sustainable communities		
Choice	Policy change	% support overall
10A	Student housing – changes to policy	84% (609/117)
10B	Requirement for housing on all sites over set size	78% (560/154)

10C	Better use of standalone supermarket sites	84% (566/108)

4.18.11 Choice 11 – Delivering affordable homes consulted upon changes to our affordable housing policy, to increase the % required as part of new development from 25% to 35%, and the type of tenures required to be delivered. There was support for both policy changes, but the level of objection to this, specifically from the development industry is highlighted.

Choice 11 - Delivering more affordable homes		
Choice	Policy change	% support overall
11A	Increase affordable housing from 25% to 35%	72% (518/204)
11B	Mix of house types and tenures	78% (539/150)

4.18.12 Choice 12 - Building our new homes and infrastructure. This choice set out three options for where we could build our new homes and a range of sites to deliver them. The three options were – a brownfield, Council and partner led strategy, a greenfield, developer led strategy and a blended approach. Most responses supported the brownfield strategy; however it must be highlighted that landowners and developers supported the blended approach. In terms of the options for sites, these all received both support and objections, with Kirkliston receiving the highest level of objection. Some brownfield site, including the Inch Park Depot also received a high level of objections.

Choice 12 - Building our new homes and infrastructure		
Choice	Policy change	% support overall
12	Spatial strategy Brownfield Greenfield Blended Approach	 76% 5% 19% (889/65/216)
	Sites supported (numbers) Calderwood Kirkliston West Edinburgh East of Riccarton South East Edinburgh	 141 156 145 147 156
	Sites – objections (numbers) Calderwood Kirkliston West Edinburgh East of Riccarton South East Edinburgh	 249 654 284 263 447

A city where everyone shares in its economic success

4.18.13 Supporting inclusive growth, innovation, universities and culture. This choice consulted on a new policy to support inclusive growth in Edinburgh. The choice received a high level of support.

Choice 13 – Supporting inclusive growth, innovation, universities and culture		
Choice	Policy change	% support overall
13	New policy supporting good growth	83% (530/108)

4.18.14 Choice 14 – Delivering West Edinburgh - this choice set out options for future growth in West Edinburgh, including the use of an 'area of search' to accommodate the findings of the current West Edinburgh study, and allocations for development at the safeguarded Royal Highland Showground site to the south of the A8 and the 'cross-winds' runway. The area of search approach was generally support, but both options for development received mixed support, with most comments stating the development would be premature to the outcomes of the West Edinburgh study.

Choice 14 – Delivering West Edinburgh		
Choice	Policy change	% support overall
14A	West Edinburgh (area of search)	76% (441/137)
14B	Remove safeguard at Royal Highland Showground	54% (293/246)
14C	Allocate cross-winds runway for development	56% (293/234)

4.18.15 Choice 15 - Protecting and supporting our city centre, town centres and existing offices. This choice looked at the role of our town and local centres, and most policy changes received support. Change that received less support were in terms of the use of supplementary guidance which divided opinion, and hotels in town centres, which received a reasonable level of objection.

Choice 15 - Protecting and supporting our city centre, town centres and existing offices		
Choice	Policy change	% support overall
15A	Continue town centre first approach	87% (579/87)
15B	New shopping only in town centres or where gap is identified in walking distance	83% (536/111)
15C	Review town and local centres, including new centres	88% (533/76)
15D	Continue to use supplementary guidance for town centres	55% (285/234)
15E	New hotel provision in town centres	58% (364/267)
15F	Reduce retail within centres for leisure and other uses	74% (422/148)

4.18.16 Choice 16 – Delivering office, business and industry floorspace. This choice looked at the role of our business and industry floorspace. Most choices received a good level of support, apart from the proposal to allow more leisure in town centres, to require office as part of mixed-use development and amendments to the Leith Strategic Office Location to remove areas with residential consent.

Choice 16 – Delivering office, business and industry floorspace		
Choice	Policy change	% support overall
16A.1	Support strategic office locations	89% (449/58)
16A.2	Support office at commercial centres	90% (435/50)
16A.3	Support office in city centre as part of major mixed-use developments	78% (372/107)
16A.4	Amend Leith Strategic Office Location to remove areas with residential consent	65% (260/143)
16A.5	Support office in other sustainable locations	83% (392/83)
16B	Identify sites for office potential	77% (360/107)
16C	Introduce a loss of office policy City-wide City -centre No change to policy	43% (193) 25% (112) 32% (145)
16D	The reference was omitted in the consultation hub and is therefore not used	-
16E	Identify floorspace for business and industry at: Leith Strategic Business Centre Newbridge Newcraighall Industrial Estate. The Crosswinds Runway	84% (310/57) 80% (282/67) 89% (305/39) 65% (223/121)
16F	New business space as part of place briefs	77% (340/99)
16G	Continue to protect existing industrial estates (under Emp8)	87% (369/54)
16H	Support for goods distribution hubs	92% (414/38)

4.17 In all of the Choices options presented, whilst some of the support to opposition ratios narrowed from the greatest range with support by a factor of 10 to 1 in favour, only seven of the overall 61 proposal or policy sub-choices attracted less than 2 to 1 in favour and in no case did more of those who responded oppose a preferred approach choice than support it.

4.18 The consultation responses will now be used to inform the proposed plan along with the technical work to analyse evidence submitted for housing, transport,

environmental and other studies, including work with Public Health Scotland on understanding and incorporating appropriate responses to the Covid-19 emergency and its socio-economic impacts.

4.19 Further to the above, key government, government agency, transport bodies and development industry bodies responses were:

4.19.1 **Scottish Government**

- Appreciates Choices positive and forward-looking approach, and its accessible format;

- Supports the overarching vision and outcomes that are being sought by 2030; and

- Supports City Plan 2030 to take into account the findings of the West Edinburgh Study.

4.19.2 **SEPA**

- Recommend a comprehensive strategic flood risk assessment is carried out that cumulatively assesses the impact of the City Plan 2030 strategy on the following sources of flooding; rivers, coastal, surface water, sewers and also factors in the effects of climate change.

4.19.3 **Transport Scotland**

- Supports brownfield strategy and planning development based on public transport;

- Concerns over timing of the transport appraisal – it needs to genuinely influence the plan strategy;

- Plan will need a Regional Developer Contributions framework; and

- Need at least one exemplar walking and cycling route.

4.19.4 **Sustrans**

- Generally supportive; and

- Walking and cycling routes identified don't address city's missing links.

4.19.5 **Homes for Scotland**

- Applying minimum densities mechanistically is not an appropriate strategy;

- Favour mix of green and brown however more greenfield needed than shown in Option 3 as assumptions on urban brownfield land are not realistic;

- Should also include smaller greenfield sites to increase housing supply in the short term;

- Consider higher Housing Supply Target of 52,800 between 2019/32 as a minimum may be appropriate. Greater generosity required if relying on brownfield. (43,400 in choices);

- Do not agree with 35% affordable housing policy. Combined with not releasing new sites this would reduce supply through a combination of reduced land availability and viability challenges on brownfield sites; and

- Do not agree with inclusion of health care contributions.

4.19.6 **Scottish Property Federation**

- Minimum density of 65 per ha is too high;

- Platinum - should be silver standard.;

- Not convinced planning system best means of regulating short term lets;

- 35% affordable housing too high and could make sites unviable;

- Do not support loss of office policy as unnecessary restraint on market to adapt;

- Favour blended approach for Choice 12.

- Support:

  - reduction of retail floorspace in centres due to drop in demand; and

  - business space in new residential led developments but not a blunt approach.

4.20 Comments were received on the interim Environmental Report required to accompany Choices from statutory consultees including Scottish Environment Protection Agency, Scottish Natural Heritage, Historic Environment Scotland and from several other interested partied. These offered broad support for the approach and noted detailed matters in respect of some parts of the assessment which will be used to refine the evidence base and assessment and inform consideration for the proposed plan.

5.   Next Steps

5.1 The Council must give 'due regard' to the responses to the consultation in producing a Proposed Plan as 'the settled view of the Council' on strategy, sites and policies. The Proposed Plan will be brought to Committee for consideration of the responses to the consultation submissions and the recommended strategy, sites and policies. This will be supported by the technical work on transportation, education, infrastructure, financial planning, environmental and other considerations.

5.2   The Proposed Plan as approved by Committee then goes out for a period of representation for a statutory minimum of six weeks. At that point all sites within 20 metres of a site or proposal in the Plan are neighbour notified. The Council must then consider whether to modify the Proposed Plan in the light of representation responses and submit it to the Scottish Ministers for Examination of all unresolved representations.

5.3   The Examination is carried out by Reporters on behalf of the Scottish Ministers and its conclusions and proposed modifications are 'largely binding' on the Council.

5.4   The Council then has three months from the date of the Report to consider any proposed modifications and approve a Finalised Plan with an intention to adopt it.

5.5   The intention to adopt is then notified to Scottish Ministers, who have a 28-day period to consider whether or not to make a direction that the Council does not adopt the Plan or that it be amended. That 28-day period can be extended by the Ministers.

5.6   Subsequent to adoption there is a six-week period in which any party can challenge the Plan at the Court of Session.

6.   Financial impact

6.1   This report has no direct financial impacts. The budgetary implications of the Proposed Plan will be set out in supporting papers at that stage. Choices was accompanied by a high-level financial statement.

7.   Stakeholder/Community Impact

7.1   Early engagement has informed the process of arriving at the Choices document.

7.2   The formal consultation stages are set out in statute and focus in the main issues report (Choices for City Plan 2030) and Proposed Plan stages.

7.4   City Plan 2030 has a key role in delivering Edinburgh's vision and aligns with the Edinburgh Economy Strategy which is tailored towards delivering good growth for everyone. An Integrated Impact Assessment (IIA) has been carried out as an integral part of the plan project and will be reviewed and updated at each stage of the process and will be available as a public document.

7.5   The IIA identifies potential negative impacts on business and urban communities resulting from providing housing land in existing urban areas. Further choices set out in Choices for City Plan 2030 aim to mitigate this through provision of new business floorspace and re-provision on sites where business floorspace is redeveloped for housing and other uses and a placemaking approach.

7.6   The assessment concludes that overall Choices for City Plan 2030 will support equality, health and well-being and human rights and have positive socio-economic

impacts overall. There is no expected negative impact. Further IIAs will be carried out as the project progresses.

7.7 The risks associated with this area of work are significant in terms of finance, reputation, and performance in relation to the statutory duties of the Council as Planning Authority and in several of its other capacities.

7.8 Project governance arrangements include regular monitoring and management of identified risks.

7.9 Detailed project governance arrangements and controls have been informed by the findings of an internal audit. The recommendations of this audit were referenced in a report to the Governance, Risk and Best Value Committee on 16 January 2018.

7.10 There are no direct sustainability impacts arising from this report although the ability of the Council to manage successfully the impacts arising from the growth of the city through the proposed plan is critical to achieving sustainable development.

7.11 A Strategic Environmental Assessment is being carried out as an integral part of the plan project. Its findings are set out in an Environmental Report, which is available as a supporting document at www.edinburgh.gov.uk/cityplan2030. The Environmental Report will be the subject of its own separate statutory consultation.

8. Background reading/external references

8.1 Supporting documents for the Choices for City Plan 2030 main issues report are available online at www.edinburgh.gov.uk/cityplan2030:

    8.1.1 Monitoring Statement;

    8.1.2 Commercial Needs Study (in four parts);

    8.1.3 Housing Study;

    8.1.4 Edinburgh Strategic Sustainable Transport Study (Phase 1);

    8.1.5 Environmental Report;

    8.1.6 Integrated Impact Assessment; and

    8.1.7 Financial Resources Appraisal.

8.2 Development Plan Scheme, report to Planning Committee, 22 August 2018

8.3 Local Development Plan – Elected Member Involvement, report to Housing and Economy Committee, 7 June 2018

8.4 Edinburgh Local Development Plan 2 – project Overview, 22 March 2018

8.5 Programme for the Capital – The City of Edinburgh Council 2017/2022, 24 August 2017

8.6 SESplan Strategic Development Plan 2, Proposed Plan (October 2016), available at: www.sesplan.gov.uk

8.7 Scottish Government Circular 6/2013: Development Planning

9 Appendices

9.1   Appendix 1 – Consultation responses

9.2   Appendix 2 – Development Plan Scheme

Appendix 1 - Choices for City Plan 2030 Responses

The full responses to Choices for City Plan are available on the Council's website at www.edinburgh.gov.uk/cityplan2030

A Sustainable City which supports everyone's physical and mental well being

Choice 1 - Making Edinburgh a sustainable, active and connected city

1A We want new development to connect to and deliver this network Total responses - 905		
Agree 92% (837)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• This will make a large contribution to reducing carbon emissions by encouraging a shift from motorised travel to active travel by providing a welcoming setting and more routes. It also increases *resilience* to climate change, particularly flood risk and heat control. • Provides quality of life and amenity:- boosting mental and physical health. • The network must be a priority to deliver high density brownfield sites. • Reduces noise. Reduce/ calm traffic near these areas. COVID-19 lockdown showed what a car-free city could be like. This should be embraced. • Improves placemaking, however landscape assessment needs to be done.	• Delivery of green network vague and lacking in detail. The network shown in Choices is not a connected network. 200 yards of cycle lane which cyclists need to stop and give way to traffic to at the end, will simply not be used. • The last few routes City of Edinburgh Council have made have been useless - Leith walk is a farce, the connection to the meadows is massively under-used as it is not cyclist friendly. • Map 1 shows some routes that there is little merit to completing given they like in flood risk areas or are earmarked for airport expansion for example. This map should be checked before informing Cityplan. • Not reasonable to expect development to deliver network in its entirety.	• Not enough information to agree or disagree. • Scottish Environment Protection Agency recommend a strategic flood risk assessment is undertaken to inform the LDP and Green/Blue network. • Green infrastructure will need to be retrofitted in to the existing built environment given limited connections between green and blue spaces. • Map 1 in Choices shows parts of the green network that are actually the Green Belt rather than linking up green spaces in the urban area. • Map 1 showing the existing active travel network is incorrect as some routes shown as complete are not finished.

1A We want new development to connect to and deliver this network Total responses - 905		
Agree 92% (837)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Biodiversity is enhanced, especially through wildlife corridors but also at a small scale as it can assist with habitat for with pollinators that then have knock on benefits e.g. crop production etc. Some representations note this proposal should require biodiversity net gain for all developments. • Enriches and build communities but it must reduce inequality. • Provides tourism and economic openings. • The network must be accessible, with some saying within 100m of homes and workplaces. • The allocation of greenfield housing sites provides opportunities to extend existing green corridors/active travel routes into the countryside. It is also much easier to plan and build green/blue infrastructure into new development than retrofit into existing built form. Some representations argue however that existing green network assets should not be used to justify housing allocations. • Scottish Environment Protection Agency assert that funding should be proportionate to developer's margin for return from their development and that contributions must be used where most appropriate rather than be tied to the development from which	• Some aspects of network are existing deficiencies it is not appropriate to expect new development to address. • Any requirements for new development to contribute towards the network should be necessary and related to the development and be proportionate to the scale and type of development proposed. • Need to fully understand land ownership as the relevant land will be in different ownerships. • Designation of parts of the network should not be used simply to prevent development. • It will not be appropriate or necessary for all forms of green and blue infrastructure so each site should be assessed on a case by case basis e.g. an urban infill site may not require "blue" infrastructure. • The main issue is the network requires substantial investment and an element of compulsion. If this is not addressed by City of Edinburgh Council the next LDP will just bring about disconnected bits of green space.	• The relevant landowners of new sections of the blue/green network should be consulted before designation. • The parameters and the scope of the Green Network is yet to be defined and consulted upon by the Lothians & Fife Green Network Partnership, part of the Central Scotland Green Network. • The City Plan 2030 must build on the policy framework set out in the approved SESplan Strategic Development Plan (SDP) and adopted LDP. • Clarity sought on who shall maintain this network. Many representors – including some developers and land owners as well as community groups – argue this should be CEC and this needs to be backed by sufficient revenue budgets to prevent deterioration which increases development pressure. • To help achieve this then appropriate sections of urban greenbelt should instead be identified as protected areas of open space and form part of the city's green network.

1A We want new development to connect to and deliver this network Total responses - 905		
Agree 92% (837)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
they received as this may have no relation to mapped green infrastructure priorities. • Scottish Water has successfully piloted a 'geotagging' system that is recommended here to ensure developers to submit a series of detailed photos with coordinates. This can be used to efficiently verify that developer-led aspects of the network are adequately delivered. • There is currently much privately-owned green space in Edinburgh, especially golf courses, some of which could be adopted for public use or at least have routes made around/through them. • City of Edinburgh Council land which is unlikely to be redeveloped within 3 years should be prioritised for temporary greening. • The network requires to flexible and adaptable over the LDP period. • Making optimum choices for the provision should be data-driven; using Graphical Information Systems mapping, census data and visualisation tools. • This should include renewable energy and energy storage.	• The current LDP supports green networks but has not brought about any real improvement. Choices should address why this has not happened. • The network should include play and sport provision • This is not as important as other issues such as maintaining existing green spaces so funds should not be diverted to this network. • Edinburgh already has more green space per head than any city in Europe.	• By gradually removing on-street parking we could also free up space in the heart of the city for this infrastructure. • There should be regard this network to overlap with other networks. Heat networks for example comprise pipes, mainly buried, which typically are laid in streets but which would work well under other land use enabling periodic excavation for repair, to make connections or extend the network. • A citywide Tree Preservation Order should be promoted to assist with this network • Several representations need for walkers to be given highest priority. Concern that cyclists can go too fast, cause difficulties with animals and pedestrians. More needs to be done to restrict poor cycling practices where possible – eg speed limits, separate cycle lanes, speed bumps, chicanes etc. Existing "dual use" paths are not fit for purpose and adversely affect the safety and comfort of pedestrians. • Private school playing fields should be looked at. How much more space per pupil do some of these schools have? One suggestion is to

1A We want new development to connect to and deliver this network		
Total responses - 905		
Agree 92% (837)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• SESplan worked with Scottish Natural Heritage and all member authorities setting out thinking on the city region's existing and future green / blue networks. This should be a starting point for further refinement of the City of Edinburgh's network along with the green network proposals in neighbouring plans. • The network should link all forms of green and blue spaces, including coastlines, river corridors. • This network addresses a range of statutory duties as well as deliver on the Central Scotland Green Network, a national development in National Planning Framework 3.		equalised this so all pupils have the same or for excess to be given to common good or at the very least be accessible to the public on the same terms as state school facilities. • Local areas should be asked about specific routes they would like and even volunteer roads to be included in a green route, for example to create only residents' car access and commit to giving cyclist/pedestrians priority. • There are blue, green network policies already adopted by other Councils around the UK and City of Edinburgh Council should draw on these to formulate a best practice policy to include in the City Plan.

1B: We want to change our policy to require all development to include green and blue infrastructure		
Total responses - 893		
Agree 90% (805)	**Disagree 10% (88)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- This is a necessary component of a brownfield first and a higher density approach to development. - Provides improvement in the quality of environment which would become visually more interesting and more attractive. Landscape and built environment setting and relationship is important to integration. - Biodiversity and ecosystem improvements, particularly increasing connectivity, corridors and habitat. Many of these interventions can form part of buildings. - Boosts public mental and physical health by providing a natural and accessible environment that encourages recreation - Also increases active travel as sites becoming more permeable and there shall being increased active travel connectivity between destinations. Paths and cycle lanes should be separate from roads. - Assists with wellbeing, de-stressing as well as social contact. Sports and play provision should be included. - Creates opportunities to enrich and build communities.	- Certain forms of development which do not necessitate the need for green and blue infrastructure. may be difficult to deliver on smaller of brownfield sites for example and with cognisance to achieving density targets or for listed buildings which are inherently incompatible with many aspects of green and blue infrastructure. - Providing green and blue infrastructure on site may mean reducing the scale, or even abandoning proposals. This is large problem given the housing shortage and the fact there are a number of other City Plan costs and the economy is in a bad place. - Every case should be balanced on its planning merits overall. For example, it may not be feasible to incorporate natural features into every development. A criteria-based policy could assist in assessing circumstances for individual sites. - Green and blue infrastructure should not be seen as an excuse to build more housing and commercial properties just because they have a few of these features as these do not outweigh the impact development would have on the area. - A balance needs to be struck in terms of photovoltaic panels and grassed roofs. Living roofs and septic systems would be inappropriate and potentially cause	- Clear guidelines including examples are needed on what constitutes green or blue infrastructure, the quality and scale of provision required and what alternatives could be agreed where on site provision is constrained. Mechanisms or 'metrics' can support developers and planning officers to interpret what should be delivered at a site level should usefully be included and referenced in this policy. This quality should be measurable and frequently evaluated. - See "Drawdown Review" for the list of growing methods that sequester carbon. - Developers should be funding blue and green infrastructure. The inclusion of green spaces and blue-green infrastructure provision within new developments – as with off-site financial contributions - should be proportionate to the scale of the site and proposal. - There are instances of conflicting requirements between that of the Local Authority and Scottish Water particularly with regard to levels of surface water attenuation. Infrastructure provision must be informed by robust technical solutions and agreed in line with the respective requirements of SEPA and Scottish Water to facilitate adoption. This will be very important

1B: We want to change our policy to require all development to include green and blue infrastructure
Total responses - 893

Agree 90% (805)	Disagree 10% (88)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Reduces noise pollution, in particular from traffic. - Trees and plants absorb particulates and provide cleaner air. - Green and blue infrastructure also controls temperature (for example through tree shading). Helps in other extreme weather events like droughts through providing irrigation. - This is a way to absorb Carbon and methane. - Assists with mitigation and adaptation to a changing global and local climate through reducing the impacts of floods through improved surface water attenuation and using less Impermeable surfaces. - Reduces surface water inflows into the sewer network. This can help free up capacity for new development and reduce backing-up events - Provides economic development openings. This would make the city as a more attractive which would improve the image of Edinburgh on the	problems for surrounding properties in places such as New Town. - New green infrastructure will be important, but it should not be instead of private open space and gardens. New housing should provide for gardens. The coronavirus pandemic lockdown has highlighted the limitations of flatted developments and the advantages of easy access to private gardens. - More research is required on the maintenance and life cycle costs of living roofs. - Green and blue infrastructure takes up space, this is a challenge in delivering the density aspirations if these are to be calculated using gross area. - Green and blue infrastructure will deteriorate as it will not be maintained. - Ponds and secluded areas can also be a risk for young children. - The use of conventional drainage and flood risk measures is adequate, providing these are updated. - It is already a requirement of Scottish Water to reduce rainwater discharge into Edinburgh's combined sewer network. Scottish Environment Protection Agency also have become increasingly	given the requirement at question 1H for green spaces to have management arrangements in place. - How will the blue and green network tie in with the 'extra large' green space standard (1E) proposed design and access statement (2A) revision of design and layout policies (2C) creation of place briefs (4A) etc? - Soil should be included as an aspect of green networks, with the coast and other different forms of water comprising blue infrastructure - Student accommodation has been raised as a form of development that is often especially deficient in blue and green infrastructure. - Green initiatives are not included in the valuation of property, therefore, this unfairly compromises those willing to redevelop. Anyone wanting to sell their property should have to upgrade to green to be fair. - More information needed on how to use and access the green and blue network.

1B: We want to change our policy to require all development to include green and blue infrastructure Total responses - 893		
Agree 90% (805)	**Disagree 10% (88)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
National and International stage as a tourist destination • This is backed by research and the new Public Health Scotland's six Public Health Priorities • Many measures can be fitted into urban environment, for example trees in place of parking space and green roofs on buildings that can improve amenity as well as environmental benefits. • This is especially important where there is poor green/blue infrastructure provision at present e.g. where people live further than five minutes' walk away from their nearest usable green space • Disabled users must be considered with blue/green infrastructure. • Living roofs would allow tenement dwellers garden space. • Green and blue infrastructure delivers multiple benefits at one time. Appropriate placement of trees are an example of this where they provide landscape improvements, aid flood control of rivers and sequester CO2. Planting of deciduous stock should be mandatory in all new developments of a certain scale.	restrictive on development which could create potential flood issues. Better time and use of resource would be spent working with Scottish Water to identify issue points into the existing network and seeking to improve/ remove rainwater discharge from the network by implementation of such blue/ green infrastructure . • This is incompatible with the wider goal of increasing housing stock in an affordable manner. The extra costs of this will be passed onto the consumer, meaning higher property prices leading to pricing even more people out of being able to live and work in Edinburgh. • Green roofs and walls do not look good after a few years when they are not maintained.	• Is this something which will require conditioning to confirm implementation? • Opportunities for environmental/biodiversity net gain and blue/green infrastructure should include measures relating to grey assets as well as at the coast, in rivers and more conventional terrestrial parts of cities. Resources to draw on for this include: Greening the Grey report (http://eprints.gla.ac.uk/150672/), Edinburgh's Shoreline project (http://edinburghshoreline.org.uk), and the SNH biodiversity challenge fund Wildline project in Edinburgh (https://www.snhpresscentre.com/news/nature-fund-announced-gbp-1-8m-given-to-biodiversity-projects). • Ensure that homeowners cannot pave over their gardens, both in new developments and existing housing areas. This can be helped by not forcing permit and parking charges for home owners that park in their own streets.

1B: We want to change our policy to require all development to include green and blue infrastructure		
Total responses - 893		
Agree 90% (805)	**Disagree 10% (88)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**

1C. City Plan 2030 shall identify areas that can be used for future water management within a green / blue corridor to enable adaptation to climate change		
Total responses – 862		
Agree 96% (826)	**Disagree 4% (36)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Surface water can be more sustainably treated above ground, often in conjunction with other existing surface waters, in a way that contributes to flood risk management that increase resilience to climate change and population growth. • This is important as Edinburgh already has risks of flooding from rivers, the sea and torrential rain. UK Climate projections 2018 improves our understanding of the impacts of climate change with future increases in sea level rise, rivers flows and rainfall intensity being greater than previously understood.	• Further detail required, especially on proposed locations. There is already detailed policy and guidance in respect to water management, taking account of climate change. • Areas will require to be identified through an appropriate water management strategy for the City but there are no supporting documents that identify a proposed water management strategy for the City. Ideally, such a document should be available for public consultation prior to becoming a part of the City Plan 2030. • A draft water management strategy for the City will also require prior consultation with Scottish Water (surface water management) and SEPA (flood risk	• This should include all water as part of the green and blue network, the 'blue' element includes our coastlines, lochs, river corridors, routes for rain and surface water and their flood plains. The extent of flooding in the future due to climate change should also be included. • Rising sea levels mean coastal developments have to include flood defences. SNH also note the majority of urban Edinburgh and South Queensferry is protected by sea walls and it is essential that these walls are fit for purpose, including for their role in providing / protecting coastal access. The LDP and other strategies

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Total responses – 862		
Agree 96% (826)	**Disagree 4% (36)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• SEPA recommends a strategic flood risk assessment is carried out to inform the LDP and green/blue network. • Blue infrastructure delivers many benefits in one. It contributes to controlling heat, reduce air, water and ground pollution, enhance placemaking and biodiversity as well as supports the environment and economic development. It also enhances communities. Water management prevents run off that carries our top soil into rivers which is needed to prevent loss of fertile topsoil. • This proposal assists with sewerage network as Scottish Water will not accept surface water in to our combined sewer. Representors have stated flood risk is particularly in the south of the city. It needs considerable management including upgrading sewers. • This proposal is more cost effective than retro-fitting solutions created by ineffective water management. It avoids more pricy flood protection schemes and the transfer of a flood problem upstream on the Water of Leith and other city watercourses. • Development on flood plains should not happen. Sufficient margins along the Water of Leith need to be left to rewild the riverbanks where otherwise	attenuation) before inclusion in the emerging City Plan 2030. • Lack of water management opportunities in some areas. There are also constraints such as no open water being allowed around the airport safety (attracting birds). • Build new houses with facilities for to allow re-use of "brown/grey" water for certain appropriate functions e.g. for flushing toilets given that cleaning water to is quite carbon intensive so minimise the need for it • Focus on conventional solutions: increase capacity at Leith sewage works, dredging rivers and continue updating the water network to houses.	should be accompanied by a Shoreline Management Plan. • Keep existing drains clear of all debris as this would also contribute to stopping flooding in some streets. • This needs to be accompanied by revised design of buildings to minimise flood damage on areas at risk of flood and timely warnings/advice about impending flooding events. In addition, resources are also required for both inland and coastal flood defences. Others argue there should be no building on flood risk areas at all. • The increasing industrialisation of sports facilities and farming and food production practices need careful consideration in open space and green belt areas to ensure that they do not encourage increased rates of run-off and a poorer environment. • A consistent approach with SEPA and Scottish Water will be necessary. This will require close working with Midlothian, East and West Lothian Councils. • Clear guidelines are needed including examples are included on what constitutes green or blue

1C. City Plan 2030 shall identify areas that can be used for future water management within a green / blue corridor to enable adaptation to climate change		
Total responses – 862		
Agree 96% (826)	**Disagree 4% (36)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
development might take place. This would promote biodiversity and habitat (e.g. trees and beavers) that in turn assist with reducing flood severity and risk. • Edinburgh Council should consider land included on the Vacant and Derelict Land Registry as spaces that can be utilised to manage surface water while creating enjoyable and usable amenity space for the local community during dry weather periods. • Surface water drainage considerations should happen at the earliest stage in the development planning process when land is set aside for new development. The council should designate surface water corridors/routes at a strategic or catchment scale to ensure flows during flood events are routed away from buildings. Land should be allocated strategically to manage and convey surface water on the surface and support multiple developments. • Natural drainage through soft landscaping should not be undermined through the incremental development, for example 'slabbing over' front gardens to provide crossovers to create in-curtilage parking. • Schemes must be sustainable in every sense. This encompasses design and delivery, from construction methods and materials to maintenance, utility usage and how water, waste and energy can be reduced,		infrastructure, the scale of provision required and what alternatives could be agreed where on site provision is constrained. • Prior agreement with the landowner is required, and there may be compensation necessary. Co-operation will also be needed) from other bodies such as dock authorities, river trusts and water supply bodies; with direction used if lack of co-operation.

1C. City Plan 2030 shall identify areas that can be used for future water management within a green / blue corridor to enable adaptation to climate change Total responses – 862		
Agree 96% (826)	Disagree 4% (36)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
and integration with public transport, walking and cycling. • Forth Ports Ltd are supportive however they advise the Planning Authority must have due regard to the water environment within the Port of Leith and Forth Ports' as Statutory Harbour Authority. It is not appropriate for the Planning Authority to put in place policies and proposals which would impact on the water environment within the control of Forth Ports, could impact on their operations at the Port of Leith and their ability to fulfil their obligations as Statutory Harbour Authority.		

1D. We want City Plan 2030 to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable Total responses - 852		
Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
• Edinburgh is fortunate to have a large number of green areas which are increasingly important if densification continues. Others have argued that very rarely now in Edinburgh is enough natural quality greenspace provided - and this is demonstrated by a lack of accessible natural greenspace being available to all in the Covid-19 pandemic.	• Policies set out under this section could lead to a blunt approach being taken to protecting 'poor quality' and underused open spaces'. • By introducing a 'permissive' regime, developers will seek to maximise the exploitation of green spaces, obviating the options at a later date for rehabilitating those spaces. It would be less damaging to leave a presumption against development unless on specific	• Defining what "underused spaces" and "poor quality" mean is important. 'Development' of open space is vague - does it mean develop space into better space, or does it actually mean build. • Does this option refer to privately owned land, or public realm / common good land, or both/either?

1D. We want City Plan 2030 to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable

Total responses - 852

Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• This proposed policy is supported on the basis it means there will be investment in open space rather than building on it and that space will be enhanced without a net reduction. These spaces are important for mental and physical health. • It is hard to imagine circumstances where development of open space would be acceptable, given the overall ambition to increase and enhance the amount and connectivity of green space is Edinburgh. This would certainly not apply where the space is well used and locally accessible or public realm/common good land. A strong direction that ' brownfield sites' must be developed before 'green spaces'. Consultation is also needed prior the loss of open space. • Spaces must be rigorously assessed with regard to alternative provisions and the balance of existing eco-system services benefits (which should be designated as Local Biodiversity Sites), supported by the place standard. Existing green space often has a mature combination of soils, vegetation (including trees), habitats and microbiome - all of which are difficult to reproduce in newly created green space Others note that local benefit of spaces must include consideration of access to local services and commercial ventures, such as cafes, shops and entertainment venues, which add social value to the environment under review.	site circumstances there is a justification for such development. Setting out criteria for development of open space should not be a priority unless and until inefficiently-used *built-up* space (apart from historical buildings) has been redeveloped to increase population density and allow more efficient delivery of services (such as public transport) to the whole city. • Others have argue the simplistic criteria set out in Choices means developers would argue development is suitable on all open spaces is acceptable if no nuanced framework was available give developers will claim all current spaces were underused and there would be no criteria to assess such an assertion. • Some spaces can have worth due to visual amenity benefit from to tree coverage for example precisely because they are *not* able to be publicly accessed. Making accessibility a focus for accepting development risks losing these spaces • Unable to support the circumstances where the development of poor quality or underused open space will be considered acceptable until an update to the Open Space Audit 2016 has been completed and a revised Open Space Strategy to replace Open Space 2021 has been consulted upon.	• The criteria for "local benefit" must be clearly established. • When setting out in LDP2 those areas where there will be benefit in allowing development of open space, it should be clearly communicated as to what those benefits are and how they will be delivered (what, where and by whom). • This should take account of the work of Edinburgh's Place Based Opportunities Board and maximise connections which increase social equality. The principles for identification, protection and change of open space set out in paragraphs 224 and 230 of Scottish Planning Policy are key also • The Council should prepare Place Briefs for open space sites being developed. • A further option, in appropriate circumstances, could be to specify an employment use close to existing communities to reducing polluting commuting. • "Improvements" to existing public parks should not include permanent residential or commercial buildings.

1D. We want City Plan 2030 to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable Total responses - 852		
Agree 82% (699)	**Disagree 18% (153)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Priority should be given to protecting existing mature green spaces over replacing them with new ones. Other forms of green infrastructure (e.g green roofs) or play equipment should not be seen as an acceptable substitute for open space at ground level. • Some representations however note some spaces do not meet the accessibility or quality standards set out in Open Space 2021 (often closest to areas where Scottish Index of Multiple Deprivation data shows pockets of deprivation). Furthermore the pressure to develop open spaces in general means there is a need to consider cases where development of relatively underused space / poor quality spaces may be acceptable. • Views differ on what should be done in these situations. Some say space should not be developed even if there is a deficiency in space in the area, though others argue allowing the development of open space should need to improve green connections into wider networks or if improved alterative space is provided in an accessible distance. This should including enhancing biodiversity and water management. Others note development still should only be allowed in if there are substantial alternative open	• It would be unreasonable to release City Council land for development and then require private sector land to be set aside to meet open-space needs. • The policy must allow for flexibility to account for circumstances which may not be evident now in order that they do not prevent development which may come to be considered appropriate in future within the lifespan of the emerging plan. • The loss of open space sites is a permanent loss to the public as once space is utilised it rarely ever returns. So over time the inner city becomes increasingly concentrated - as indeed the new city plan aims to do.	• Open spaces should be clearly delineated and their status defined. • Open space resulting from former arable land or pasture or from owners lack of upkeep should be better scrutinised by the City of Edinburgh Council, and addressed through existing powers. • It is important that an up to date register of 'brownfield sites' is created and maintained. • The changes should also give greater support to tree preservation orders by requiring replacement tree planting where owners seek to fell established protected trees. • Existing sports pitches should be protected • The current policy is not easily comprehensible and can be interpreted to be over-protective of poor quality open-space. • A lot of poor quality and underused areas do not feature in your plan; a lot of it belongs to Network Rail and the Council urgently need to get Holyrood to act on that.

1D. We want City Plan 2030 to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable		
Total responses - 852		
Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
spaces, sports areas and play areas within 10 mins walking distance. • This development is also beneficial to deliver needed housing and to meet challenging targets (with some arguing however only affordable housing should be allowed on these spaces). It is stated there would be demand and uptake of many of these spaces from the development industry and this could provide financial capital for green space that would remain in the area. • It is noted however there is a need for strong justification for development and that poor maintenance and neglect should not in themselves be justification for development. It would need to be understood why the space was underused? Could more be done to encourage local people to use it? How? • City of Edinburgh Council should have a policy ensuring no public space is unused for more than 12 months. • Local community bodies/groups should be given proper responsibility with the authority and necessary resources for the development and upkeep of individual spaces.		• Any spaces consented for development in any form should only do so if the land remains accessible to all and is not restricted in access by private ownership to allow pay-to-enter festivals etc. • Any time an area of open space is proposed to be lost there should be additional public consultation, with appropriate experts also involved such SNH to speak to the other merits of the space such biodiversity. • Using mobile phone maps technology (just like we have to understand Coronavirus lockdown adherence) can help us understand spaces that have low footfall

1D. We want City Plan 2030 to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable

Total responses - 852

Agree 82% (699)	Disagree 18% (153)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• A landowner of open space or green belt land has a financial incentive to allow it to become degraded and a nuisance to encourage local support for it to be developed if appropriate policies are not in place.		

1E. We want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces. A 5-hectare green space is the equivalent of The Meadows or Saughton Park. At present our policies require new development areas to provide a park of 2 hectares. We want to increase this requirement

Total responses - 872

Agree 83% (726)	Disagree 17% (146)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Edinburgh has seen a progressive reduction over time of green open space so this policy is needed. • Contribute to character of areas however it is important to consider built and natural contexts as well as landscape/ countryside surroundings. Spaces should have substantial tree/woodland planting and naturalistic housing layouts. • Biodiversity improvements, especially given the large size can accommodate a range of habitats	• Doubts whether this standard is compatible with higher density, especially if measured by gross area. It is not proportionate for new development to provide the whole 5ha space, especially for smaller sites. Development may not come forward as a result if this is applied on a blanket basis. Instead account should be had of a site's context. • In order to achieve this space standard, land for that purpose would have to be identified over and above the allocation of land for built development to ensure that there is sufficient built development to meet housing requirements and pay for necessary	• Maybe some of the city's many golf courses could be turned into parks for everyone. • Is it proposed for several smaller areas could add up to a larger overall amount over 5 ha within a certain walking distance or for a single 5ha space? Combined smaller spaces would be more readily accessible than large spaces. It is also queried where a 5 hectare spaces would go in the existing extent of the city so it should only apply to greenfield releases.

1E. We want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces. A 5-hectare green space is the equivalent of The Meadows or Saughton Park. At present our policies require new development areas to provide a park of 2 hectares. We want to increase this requirement Total responses - 872		
Agree 83% (726)	**Disagree 17% (146)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Open space is a human right. It boosts mental and physical health. Policies for new green spaces should include facilities for the active enjoyment of open spaces with paths/spaces/facilities suitable for all users, for example, play areas, kick-about areas, sports pitches, etc, to promote more active lifestyles and tackle obesity. With cycling there should be space for cyclists but not to infringe on walkers. This also creates meets placemaking objectives to enrich and build communities. Some have advised that cemeteries, burial sites and growing spaces should also be included. • Provides economic development openings. • This large scale of public space is needed given the dense, large scale of development being proposed for Edinburgh. Covid-19 has highlighted the need for these types of spaces • Assists with reducing emissions and adaptation to a changing global and local climate. It provides part of the space needed for the strategic drainage and water management needed to reduce flood risk, deal with surface water that will no longer be accepted into the	supporting infrastructure including the space expected. This could result in more land being needed for development which may be, in part, in the green belt, and / or reduce the land available for housing. has the impact on viability and deliverability of new developments been tested? • The scale of provision should only be applicable to new areas of city extension/ intensification where current provision is not accessible within reasonable walking distance. • If greater emphasis is to be given to new higher density housing with gardens to counter the disadvantages of flatted developments in the current coronavirus lockdown, then provision of 5 hectares could perhaps be reduced. 3-5 hectares might be more realistic than a flat 5 hectares. Alternatively it suggested the existing policy framework is retained and 5ha should be a guideline. • It is also unclear how the ongoing maintenance of any large new communal spaces created under this policy would be funded. If the cost of maintenance was passed to residents/proprietors of the private sector housing in the development this may create a prohibitive ongoing financial burden that will reduce the attractiveness of new developments to	• Open Space 2021 requires to be updated in order to reflect the new Open Space Strategy proposed in the emerging City Plan 2030. • Inadequate detail on extra large greenspace standard. What developments would need this? "Access to green spaces" and "within walking distance" need to be defined. How large a population should each 5 hectare space serve? • Green Belt designations should have significant permanence with boundaries only reviewed/changed every 10 years e.g. at LDP revisions. • There should be explanation of when delivery will be required. These spaces should be safely connected within new and expanding areas of the city. • It would be preferable to undertake a quantitative and qualitative assessment of what is required. There should be a broader consideration of the typology of green spaces and parks in a broader sense. This would include the coast and promenades / beaches. Sizes of existing spaces should be re-checked for correctness.

1E. We want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces. A 5-hectare green space is the equivalent of The Meadows or Saughton Park. At present our policies require new development areas to provide a park of 2 hectares. We want to increase this requirement

Total responses - 872

Agree 83% (726)	Disagree 17% (146)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
combined sewer, provide an alternative for surface water currently going into the surface sewer and help build the city's resilience to climate change. • New policy should recognise the importance of creating high quality and diverse green spaces and this quality should not be sacrificed for greater area. For example, new spaces could aligned with delivery of other requirements such as allotments and provision for green and woodland burials. • Some flexibility is required rather than an absolute requirement to account for specifics of each area and land availability and quality requirements are as important as scale. The location of these spaces in the context of green and blue corridors is as important as the size of the spaces. Ensuring good access to the spaces is also equally important. • Planning should also ensure existing dwellings have adequate space and that smaller, local spaces are still required. • Support the policy but it should go further, and also recognise the importance of even larger	prospective residents -especially given additional proposals such as increasing on-site affordable housing requirements. It is also unfair for developers (and thereby new residents) to bear the whole cost since the new 5 hectare spaces will be used by others outwith new developments . • Others argue community trusts should maintain these spaces, with funding from the Council (though others argue volunteers can make a contribution). Some argue for adoption by Council with a commuted sum from the developer towards maintenance. • There ought to be some flexibility in this requirement where smaller high quality space might be preferable to a 5 ha poor quality space. A range of smaller sizes of space are proposed stating 2/3/3.5 hectares is sufficient (with some arguing between 3 and 5). • Reasons for supporting smaller spaces are that 5 hectares is too dangerous to cross at night, that smaller communities do not need such big spaces, that the maintenance of larger spaces will be costly and the fact a network of local parks with currently existing larger but not necessarily huge ones make	• Public open space needs to be truly public not private and restricted in who can use it. • Developers should not be able to get around this with viability assessments or section 75's. • Are we meeting the current standard? If we are not meeting the current standard then setting higher standards does not make sense at this time. • Will the introduction of a 5 hectare standard mean that the reduction in size of existing larger areas be allowed? This should not be the case. • It would be good to have a rationale to explain how the figure of 5 hectare was arrived at.

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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
greenspaces over 5 hectares. Why five? Why not four, or six or ten. • Large spaces are good for community spirit/events and general pride for Edinburgh (though some wish to see fewer large spaces precisely to reduce these gatherings which some consider detrimental to local residents).	parks available to more people, also those with mobility issues. • The extra could provide much needed space for housing, recreational facilities, & job creation etc. It will also drive up prices developers will charge for properties due to unavailable space in an already crowded city. • Also with Covid 19 we do not want people to congregate in large groups (although others argue that larger spaces will actually beneficial in light of distancing coming with Covid-19) • Edinburgh already has several large areas - Holyrood Park, Hillend, Meadows , Braid Hills, Blackford Hill, Corstorphine Hill. • Some argue the need for 5 hectare spaces should be assessed on a case by case basis.	

1F. City Plan 2030 should identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area

Total responses - 862

Agree 89% (766)	Disagree 11% (96)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Food growing areas should be part of all substantial developments. This will be particularly important given the commitment elsewhere to increase the density of housing development. - To make the world we live in more sustainable, reducing food miles is key. The UK's large reliance upon high food imports that could be adversely affected by climate change, Brexit and Covid-19 - Growing food provides an educational benefit to young and old, offering potential for community involvement and recreation with purpose. They also boost wellbeing and improve mental/ physical health. This should be encouraged particularly as a result of the coronavirus crisis. - Growing spaces improves ecosystems/ biodiversity/organic production as well as air and soil quality. Reduces need for packaging etc. - Growing space is an important part of creating diverse, high quality green spaces which should be considered as an integrated whole. - The small allotments and growing spaces that Edinburgh has so far have been successful. There is a long waiting list for growing spaces and this will	- The Council's aspiration to significantly increase the density of new development is in conflict with providing land for allotments. - Should be assessed on a case by case basis and commensurate to the scale of the development. Opportunities for community growing can be incorporated into new residential developments in a number of ways. A requirement for new allotments and food growing is prescriptive and the policy should allow for a flexible approach to provision. - There is a pre-existing problem that the Council will need to deal with. In order to understand what is legitimately required to support new communities/ developments some evidence should be provided that identifies the demand for allotments from new developments, particularly flatted developments. - By removing local green spaces it would harm local infrastructure by removing well used green spaces from residents, community centres, small business owners and countless others. - It is critical the Council first consider their own ownership (including under used Open Space) before considering other locations. It is also critical that there is prior agreement with the owner (failing which	- There is not enough information given to agree or disagree. Clarity will be required as to whether the Council will provide services, manage and maintain new allotments. - The Inch Park Nursery site is already used for growing, is secured with fencing for any allotment development which would help with the massive waiting list for allotments and also afford the capability of tying in with the Growing/Food/Green activities at Bridgend Farm. Allow the Farmhouse project to use some of the land develop this as they do not have any land to support the healthy eating projects they want to roll out to schools etc. - Allotment requirements should not applied as a 'formula'. A survey of priority needs in each local area needs to be carried out. There are many areas that would rather have, say, space and facilities to occupy older children and teens (fenced 5-a-side court, skatepark etc). - Conversely however other areas such as the waterfront areas of Newhaven, Leith and Granton (North Edinburgh) are noted as having little or no proposed or existing allotment provision where high-density, tenement

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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
only grow with new housing and the increase in popularity of vegetarianism, veganism, etc. • Growing spaces and producing a food growing strategy is a requirement for City of Edinburgh Council as contained in the Community Empowerment (Scotland) Act 2015. • Developers have noted that, where this is required as part of an allocation, allotments should represent part of the Open Space to be delivered on site in line with the Scottish Planning Policy definition of "Open Space". • The identification of specific sites for allotments is supported however the delivery of such sites should contribute to a sites green space contribution and not be in addition to it. Growing spaces need to be assessed/agreed as part of the wider development contributions being sought. • Allotments need to be located near the people who want to use them, so even very small parcels of land, or small corners of other green spaces should be utilised. • This proposal is needed as modern developments are particularly disadvantaged in this respect due to factoring maintaining such spaces.	the allocation will fail the tests of effectiveness set out in Scottish Planning Policy). • Identify specific sites within existing open spaces, especially underused open spaces for new allotments and food growing. • For medium density housing with back gardens means then less allotments will be required. • Allotments are good, but they're exclusive. Community garden schemes for food growing would be better. • Manage the existing ones properly. Plotholders neglecting plots should be removed. It's disgraceful that this does not happen. • Less important that other objectives such as parks and active travel that benefit a wider portion of the population and reduce C02. • Allotments and growing spaces look untidy and are not maintained well. • Urban growing is highly inefficient in producing food compared to rural farming. Food grown on allotments	housing means fewer households have access to their own private garden. • The way growing spaces are used is important to. There are existing techniques already developed and where they can be adapted as these can prevent water pollution, biodiversity loss and soil erosion, while providing ample amounts of food. • Too much development is allowed on prime farmland, which needs additional /stronger policies for its protection. • There should also be tighter regulations on the maintenance and management of the allotments to ensure that they contribute aesthetically to the local area. • In more recent flatted developments where communal gardens are provided, these tend to be subject to Deeds of Conditions which are likely to preclude vegetable cultivation or the creation of allotments. • We suggest that the current waiting list system for allotments is made more transparent and fairer e.g. with priority given to people in flats and/or with no existing gardens.

1F. City Plan 2030 should identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area		
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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• A shared community garden / growing space may suit local communities better, and be more productive and equitable than allotments for individuals or even small private gardens. • Old walled gardens in and around Edinburgh that could be returned to their former use and become market gardens. This would then provide new skills and careers. • New allotments can also reduce inequalities in access to places where people can grow things - especially important for disadvantaged and deprived communities. • Scottish Environment Protection Agency considers that these sites could form part of a connected, considered, multi-functional green/blue infrastructure. By giving parts of the green network a function, and individuals /community groups an interest in maintaining them, maintenance of part of the green network and community involvement in it is built in. Use buildings and roof-tops for allotments/growing spaces. • There will be an important role for the proposed place briefs to identify these specific sites for new allotments and food growing.	is often wasted as it tends to come in gluts. Urban crops are also much more susceptible to contamination. Urban growing undermines the rural economy. • People who want to grow veg can buy properties with gardens or tend to rural plots. Larger gardens should be required in houses to allow this. • Allotments and growing spaces usually only relate to Council owned sites so City of Edinburgh Council should be driving them forward at council level without the need for LDP designations.	• Could golf courses be converted for this purpose. • New growing spaces must be close/accessible to residents and should have access to sunlight. Also more council run sites would be more equitable and reduce the rise of 'private' consortiums restricting allotment use. • Growing spaces/allotments are especially good for being able to be accommodated in small pockets of space for example at the scale of 2-4 allotments. Others argue however that concentrating numbers is safer for all and can share lighting infrastructure/tools etc. • Parking provision needs to be made as part of allotments/growing spaces given equipment needed to maintain them. • Allotments should be divided into smaller sizes to serve more people as they are presently too large for one family.

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Agree 89% (766)	**Disagree 11% (96)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• There are a number of examples of integrating community growing into the wider urban area, including using streets, roof spaces. Others argue growing spaces could be included as part of any new greenfield releases. • The expansion of community food growing could help to deliver the Million Tree City through increased provision of orchards and single fruit growing trees in appropriate spaces. • In unlikely event of overprovision of growing spaces/allotments in future then space could be turned over to community or even private initiatives. • No maintenance cost of these spaces for the Council.		• We should also ensure that every school grows food and that growing is part of the curriculum. • Allotment holders should also, in time, be allowed to keep hens and bees. • Suburbs are better for this than central locations • Provide further guidance, funding and support for how to set up and grow in allotments as well as extra security etc. there should be a "garden exchange" scheme where people who cannot manage or afford to look after their garden give part of it over for someone to use freely in exchange for their keeping the rest tidy.

1G. We want City Plan 2030 to identify space for additional cemetery provision, including the potential for green and woodland burials. Total responses – 816		
Agree 76% (617)	**Disagree 24 % (199)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Some representations give much stronger support to green and woodlands burial schemes compared to burial in a city cemetery as the former can also contribute to creation of diverse green spaces. - It is noted there has been an increase in non-traditional burials also. - Green and woodland burials will also help relieve any pressure on historic burial grounds. - Some also argue that there may be scope in some existing cemeteries currently closed to new burials for green and woodland burial sites, provided this does not impaction on their value for encouraging wildlife and biodiversity. - A number of representations argue the cemeteries should be discouraged as there is limited space and cemeteries effectively sterilises land for hundreds of years. - Instead some argue cremations would save space and that memorial gardens should be provided with spaces for cremated remains. Making this a better known option and more easily available would encourage a lot more	- Cemeteries involve roads , buildings, car parks, fences etc that can urbanise green spaces and become visually intrusive. - Caution against identifying such space in a plan, as landowners may not bring it forward for such use. This is critical to avoid allocations in the plan which fail the effectiveness test in SPP. - Instead recommend a criteria based policy to allow providers to identify the sites most fit for purpose - Others recommend preference should first be afforded to land already vested with the Local Authority (including underused Open Space). - Green and/or woodland burial sites are not appropriate in urban or semi-rural, semi-urban locations. These would carry serious risks of vandalism. - There are contrary views on proposals for woodland burials, and there will be an ongoing challenge of sustaining the protection and maintenance of woodland burial sites.	- Unable to have a view about 'green and woodland' burials until the site location specification, design and infrastructure/ drainage requirements associated with these burials is fully specified. - The clarification of these specifications has now become urgent, as a result of increased demand for burials due to Covid 19. - Cemeteries need to be developed with great care to ensure contamination of ground water is not an unintended consequence. SEPA will work with City of Edinburgh Council to help identify suitable sites. - Green and woodland burials should be affordable to more people or even free, though it is argued these burials are for the wealthy within the city given space is limited. - Other methods for disposal of the dead are suggested, including; Human compost funerals are 'better for environment' (although others argue that "human composting" are macabre), Freeze blasting and a memorial tree planting scheme in parks to conserve space but also give place for loved ones to remember the

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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
people to choose, although some state many people already do not wish to be buried. • Others argue however that cremations are not environmentally friendly given C02 is generated • Some support for green and woodland burials is contingent on where these are located. Some support them based on the presumption that these are located outwith the urban envelope or sensitively located within the urban area, although others state actual forest is not acceptable. • It is argued a range of carefully considered settings should be considered (including in the countryside) as this would maximise choice and reduce urban land used. • There are strong requirements for burial provision for some religions. There is however the practical problem that- space within towns has to be prioritised for the living.		dead. Can also have more than one person buried on one site and/or bury the dead standing up. Graves should be biodegradable and have a lifespan of a time of mourning. Presently cemeteries are also a drain on finances for upkeep • New cemeteries should aim to more 'wild' as unkempt havens of nature where people can go and picnic and play amongst the stones. • Some argue however the public will feel uncomfortable with walking past burial sites and they would be at risk of vandalism in an openly accessible area. Also, to respect the families of the deceased then areas would need to be segregated to allow mourning away from joggers and kids playing and running about etc - • This is a pre-existing problem and should be the responsibility of City of Edinburgh Council. It should not be required as a developer contribution. • These should be located outside the city centre with good bus routes for access.

1G. We want City Plan 2030 to identify space for additional cemetery provision, including the potential for green and woodland burials. Total responses – 816		
Agree 76% (617)	Disagree 24 % (199)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• Convert current cemeteries and rebury current graves. This would allow rewilding of cemeteries or repurposing. Others strongly oppose digging it up and burying bodies

1H. We want to revise our existing policies and greenspace designations to ensure that as part of planning consents new green spaces have long term maintenance and management arrangements in place. The Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available

Total responses - 839

Agree 87% (732)	Disagree 13% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
• All green/blue space within a city, whether wild and natural in appearance or very manicured, need management to ensure their qualities are maintained. This includes any water management infrastructure as well as biodiversity and to assist with climate change. • Good maintenance of green and blue spaces creates an aesthetic environment; positive effects on everyone's mental health; promotes appreciation of green spaces; encourages outdoor activities; builds communities; helps keep air clean. • There is strong support for more 'natural', informal green and blue spaces given the lesser cost of these and the fact it would deliver greater these benefits to a greater degree. • This is important to ensure green space does not become a space for fly tipping or undesirable/illegal activity. Space should be safe for people to walk through in the dark. • Some representations argue that applications for development must be required to be supported by	• This is another cost to a new householder. A viability and deliverability assessment should be carried out in respect of all the proposed policies of the plan and set out against the ambition that Edinburgh will be a "A city which everyone lives in a home they can afford". • Factoring should not be covering the cost of new, larger spaces that are for the benefit of those beyond the immediate development being constructed. This is unfair on the new, private homeowners paying for it,. These should be adopted and maintained and managed in a similar manner and paid for through Council Tax. Others note however that it is those closest to spaces which most use and benefit from them so it is right they should pay for factoring. • Some representors argue that responsibility for spaces, including some budgetary responsibility, should be given to local, public groups. • Developers should be contracted in as part of their planning permissions to provide funding for the council to be able to maintain and develop the few green spaces that are left.	• Some representors argue that responsibility for spaces, including some budgetary responsibility, should be given to local, public groups/become common good land. The management arrangement should be agreed with locals and that the cost would be transparent to anyone and able to be challenged if not competitive. • The adoption of green spaces needs to be promoted more strongly to businesses, philanthropists etc. Tax incentives plus publicity could raise their profile. • Maintenance should be dealt with on a case by case basis given varying circumstances. • Private developments must have robust management plans in place that go decades or even a century into the future. • The current standards of planting poor, with the cheapest species and variety used, or negligible amenity or wildlife value, and with

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Agree 87% (732)	**Disagree 13% (107)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
demonstration that such long-term management and maintenance is achievable. Most, though not all, developers favour factoring arrangements as these provide proper management and maintenance in perpetuity. Some argue that If the owners of the houses are to pay for their green spaces, then the cost has to be protected by law to avoid subsequent, excessive payments. • Factoring means the residents of homes, whom directly benefit from such provision, carry an equitable financial burden and interest in maintenance. • These representors note good Factors following appropriate guidance and regulation need to be properly supported to ensure that their services are covered. • Many non-developer representations consider there is a poor standard of long-term maintenance provided by many factoring arrangements that leads to a lack of use as well as deteriorate over time and become an eyesore and problem. These representations point to many current examples of poor factoring across Edinburgh. Public ownership also avoids potential restriction of access.	• Maintenance should be dealt with on a case by case basis given varying circumstances. • Some say adoption should only be allowed if voluntary and by consent of the land owner, with provisions to take back from the council in future. • Some argue the Council's standard of maintenance is poor so they oppose adoption. There is a lack of 'checks' on contracted out projects leaving assorted debris throughout the city. Contractors cannot be trusted to manage and sign off their maintenance projects.	insufficient consideration given to resilience against disease or climate change • The council should push back into private sector more strenuous conditions for use for private events to avoid deterioration of the spaces hosting these events. • why does this only apply to new spaces? Surely this should also include all existing green spaces, except perhaps those large gardens within the city centre that are privately owned? Or should those garden be compulsory purchased and opened up to for the benefit of all residents and visitors. • Monitoring should also be considered, both before and after development. This is particularly important when it comes to aspects of managing the water environment (including management of Sustainable Drainage Systems). There should be a mechanism to end, poor factoring agreements.

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Agree 87% (732)	**Disagree 13% (107)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Representors are cynical that this will always be the case given factoring inherently focusing on profit and not residents, with many noting factors are hard to contact to address issues (especially since planning requirements are often poorly translated into deeds or absent). It is not uncommon for factors to ignore site usage rules to the detriment of the site or people living nearby and or using the site. • Consequently many representations, and a smaller proportion of developers, argue the Council should adopt all new green and blue spaces. • Some argue the costs of adoption should be tax funded however, many representors highlight the resource implications for the Council in adopting spaces (though it is noted jobs would be provide). Consequently it is recommended that developers should provide the Council with a commuted sum to take adopt and maintain spaces (some further arguing contributions should be taken toward existing spaces as well as new ones). It has been noted if this proposal involves contributions from new residents and businesses who may occupy areas involved with long-term maintenance arrangements then this must be very transparent.		

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Total responses - 839

Agree 87% (732)	Disagree 13% (107)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• It is critical to make an assessment of long-term implications for maintenance and management, before applying any planning conditions/Section 75 for green spaces in new developments.		

Choice 2 – Improving the quality, density and accessibility of development

2A. We want all development through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. Total responses – 806		
Agree 90% (724)	**Disagree 10% (82)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• This promotes the place principle in developing planned and design led solutions that address the issues of climate change, adaptability and access to create and futureproof communities that can adapt for all stages of life – which is especially important as our society grows older. • This proposal must be done at both at the neighbourhood and individual site level. • Large developments should create communities, not merely the provide housing units. They should include green space, public transport nodes (including shared travel schemes), provision of services, and integration into the surrounding environment. • There must be no dilution or ambiguity in the standards. This will ensure there is a consistent approach on determining applications. Some however state any deviate from this needs justification and detailed explanation as to why it cannot be used.	• The requirement for all development to have a Design & Access Statement, is contrary to national policy requirements on the submission of such documents. Cityplan must be consistent with this. • Design and Access statements already contain the information sought in this option. • The requirement for Design and Access Statement should continue to reflect the Edinburgh Design Guidance (November 2018) which covers what is required in these statements, as well as the existing applicable LDP policies which are acceptable as they are in providing a framework in accord with the statutory requirements of the approved SESplan and SPP. • Building standards and other consenting regimes and often the most appropriate ways for consideration of many of these issues, including design details. It will be important that any policy avoids duplication and adding unnecessarily to the significant amount of documents already required to accompany applications, adding time and cost to both their preparation and processing. It may also deter	• There is not enough information given to agree or disagree. What is meant by adaptable in this context.? 1) whole development adaptable to climate change and/or 2) individual buildings adaptable to climate change, e.g. retro-fitting heat pumps?, and/or 3) development, or building, level adaptability for accessibility issue? • As a possible alternative that applicants should have to demonstrate how the design will reduce/minimize emissions, rather than tackle climate change. Emissions include both greenhouse gases and air pollutants. It is possibly something that can be more easily measured and demonstrated. • Local Authorities (LAs) must monitor and, if necessary, enforce this as well as the 'climate change plan'. Penalties should be up to, and include, demolishing if requirements are ignored in the final construction.

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Total responses – 806

Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Measurable criteria should be established from the outset to enable fair and consistent application of any new standards. • This need to counteract and adapt to climate change should be demonstrated in all applications, for example by reducing flood risk and not merely avoiding it. • It is vital that developments maximise opportunities to use low/zero carbon heat. The City Plan must also support the delivery of Local Heat and Energy Efficiency Strategies (LHEES). • The potential future energy needs of development must also be addressed as far as possible, such as the increasing demand for electricity or alternative energy sources such as hydrogen for appliances and vehicles • Poverty has increased across the City with this experienced, in many cases, by families with a member with mobility challenge. Improving accessibility has the potential to contribute towards improving this wider social issue. • Flexibility in design to allow future reductions in car parking provision is wise given we are planning until 2030. Add a generous supply of high quality, secure	development from taking place, especially for smaller developments/conversions. • Planning policy which conflicts or goes beyond other statutory requirements causes confusion and delay and adds unnecessarily to costs. It is important that the requirement "to demonstrate" is reasonable and proportionate. This is important given the present economic outlook is very uncertain. • There may be some buildings where accessibility issues, or climate change mitigation, may simply be unfeasible and/or unduly onerous. For example, the adaption of older buildings including tenements may not easily be amended for accessibility design issues. This could prevent those otherwise sustainable brownfield sites coming forward for development. • There are concerns this proposal means disposing of the current DES 1,3,6,7,8, HOU 4, Env 20. • Clarity required on how 'future adaptability' should be illustrated as part of a planning application for a development. • The proposed measures should only apply to applications submitted following adoption of the LDP and not retrospectively to currently pending applications.	• We need a better understanding of what people with varying needs require and how we can also bring people with differing needs together in some of the space. • Modify this proposal to include a target of 10% accessible housing in line with the recommendations of the Equality and Human Rights Commission to ensure that a minimum of 10% of new housing is built to wheelchair-accessible standards. Others argue the equalities legislation is sufficient to address this. • All new-build ground floor should also be readily adaptable for installation of tracking hoists and wet floor bathrooms. • Any standards set out should now account for any Covid 19 effects, for example paths may need to be widened to facilitate 'social distancing' and greater facilitation of working from home in dwellings. • The quality of the new-build environment permitted all Councils other councils has, all too often, been emphatically not "fit for purpose". The impact of all this sub-optimal

2A. We want all development through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts.

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Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
storage for shared bikes and normal bikes in close proximity to or within housing. • It is important that all new building, particularly in the city centre, are designed to be adaptable to possible change of use – especially to residential. • It could be requirement for Design and Access Statement documents to include a standard set of information and this needs to be submitted before an application is validated as well as the minimum standard required. • Developers should have to support development of public transport for their proposals and car parking spaces should have to be financially offset through green initiatives. • Design statements should still retain a focus on quality of design that should maintain Edinburgh's sense of place, for example using natural sandstone and other local materials where possible.	• This policy should go further in requiring greater environmentally positive measures. Many suggestions were made, this included: completely car free developments, as well as solar panels/ground source heat pumps. There should be green walls and roofs on all developments. All materials used should be sustainable materials. There should be mandatory protection for all existing mature trees. All houses should be passivhaus standard. Stop developers using individual gas driven central heating as a first step to moving to district heating. Design and access statements should also demonstrate how the development will add value to the community in terms of accessibility of local services, shops and facilities within walking distance. This emphasis on going further applies to each of the other applicable options set out in Choices also. • These requirements is open to tokenistic responses from developers. • The future uncertainty created by climate change and Covid-19 means we should not be introducing requirements for such an unknown future.	construction has been to substantially degrade and diminish not just the immediate area of the development site itself but the wider environment too – clogging up the central belt and strangling its towns and cities. • Development should have to leave land to put the sub stations in to provide charging points so as to avoid, or there is a creep into public land. • Better routes for walking and cycling are a necessity and should be along all current bus routes in place of existing road space. • A far more thorough and demanding set of compulsory sustainability criteria need to be required of applicants (including appropriate baseline surveys to determine the presence or absence of priority wildlife and habitats) as well as accounting for the water environment and soil exhaustion. • Do not use prefabricated units to build houses with. They will not last.

2A. We want all development through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts.

Total responses – 806

Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• Do not allow solar panels, they are very inefficient at this latitude and climate. Also solar panels require rare earth metals witch in the harvesting of these elements produces several metric tons of co2 also in the manufacturing of solar panels produce high amount of toxic waste which stays toxic for a long time. They are also visually unsightly. • For some of older buildings it is argued that the suggested adaptations are just not possible. This policy puts them in danger of being knocked down and new development put in place. This is not environmentally friendly. • Removing space for parking encourages taxis to constantly arrive and leave, dropping people off. Taxis then wait for pickups running their engines constantly.	• Prevent the use of garages that are not large enough for cars as this is wasted space that could be put to better use. • Noise transference issues must be dealt with - not just airborne sound but also impact sound which is very hard to retrofit away. • consider other green energy generation on all housing, retail and business concerns as well as blue or green infrastructure for car parks and infrastructure. Others argue it would be too financially onerous to apply requirements to *all* buildings. • Demonstrating how proposals account for children as well as older residents is required. • If houses are to be adaptable, there must be minimum size standards imposed – currently our houses are the smallest in

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Total responses – 806

Agree 90% (724)	Disagree 10% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		Europe with almost no storage, creating stress and mental health issues. • Climate-impact should include construction process and the environmental impact of the materials used. Retention and reuse should be an absolute priority. Some argue new housing should only be allowed where it replaces older, energy inefficient homes.

2B. We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed.

Total responses - 805

Agree 64% (724)	Disagree 36% (82)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Higher densities are needed to accommodate the additional housing Edinburgh needs for its increasing population. • Supported on the basis higher density developments are located by active travel networks and public transport and developed and contribute to green and blue network. This will reduce have positive impacts for the climate and air quality. The efficient use of land is encouraged by SPP. • Dense developments must be sensitive located and designed to be high quality and sensitive to the existing built and natural environments. This are especially relevant in Edinburgh, for example it has variegated and historic townscape that is sometimes low-rise in nature. Spaces between buildings and the setting of many landmarks need to be preserved also. • Many parts of Edinburgh are already a dense and 'vertical' city dominated by traditional tenement dwellings with a vertical aggregation of uses. This creates mixed use, sustainable communities with appropriate greenspace, amenities and services as part of the solution. This should include workplace possibilities, healthcare facilities, schools, nurseries, youth clubs, shops and parks.	• Applying minimum densities mechanistically is not an appropriate strategy. It is contrary to aims of SPP to provide positive and flexible approach to development as well as encourage placemaking as also set out in Designing Places. It takes no account of site specific circumstances for example in terms of character and density. As a result it may not be possible for some sites to be developed if they have to meet a minimum density requirement as well as comply with design and amenity planning requirements for example. • Also, this arbitrary density requirements takes no account of how units would be occupied. For example, one would not expect the same density for a block of flats inhabited by single people and couples with no children as one would if its aimed at households with children, and possibly three generations under the same roof. • Overall however brownfield sites for example require little supporting infrastructure however in contrast to greenfield sites require new infrastructure so applying the same density requirements is not appropriate. This also illustrates the use of gross density to calculate dwelling density per hectare would be unnecessary and detrimental departure from current design policy as it would include road infrastructure etc. Applying a typical gross to net ratio (assuming 70% of the site is "developable" – applicable to	• City of Edinburgh Council's view is that 80% of units would be houses at a density of 65 dwellings per hectare however according to the EMA analysis this split would be the opposite way round if based on a gross site area. Even on a net developable area then only 50/50 can be achieved. Others have noted that, even to achieve 50/50 mix across a site would need 4 storey flats and 2 storey housing, but only if 2/3 of the housing is terraced. This will derive a layout providing predominantly smaller 1, 2 and 3 bed homes with little prospect for providing family housing. • To achieve a density of 93 homes per hectare (net) or 65 per hectare (gross) would require a different design solution which would require a greater percentage of flats (around 75%) or much higher flatted buildings (around 6 storeys). • It would be unreasonable to on the one hand set out a policy on density which would require a high proportion of flats while on the other seek higher education

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Mixed uses mean people have to travel shorter distances for day to day activities such work and amenities - it is typically more sustainable with a lesser environmental impact, doing more with less. This accords with the placemaking principle. Particular support for the Paris based idea of having all needs satisfied within 15mins. • Denser more compact development allows more space for more generous green spaces closer to dwellings (some developers argue the opposite however) and which can have many benefits including surface water management (something which especially benefits from being close to the development it serves). Green and blue spaces also improve health, biodiversity, placemaking and community building amongst other factors. Allotments and growing spaces can be provided too. • Higher densities allow more efficiencies across a range aof areas, including in terms of energy generation, storage and conservation. It also allows optimal use of space in layouts, for example to provide extra amenity and functionality such as cycle parking etc. • Whilst we agree that increasing density thresholds is appropriate, it is suggested that policy should be more dynamic. Rather than one or two absolute minimum thresholds, could density requirements	Greenfield and larger Brownfield sites) then that minimum density would rise to 93 homes per hectare (net). Instead we should continue using net developable area. • The reality of socio-economic aspects is some people can afford four-bedroom detached or semi-detached houses with big gardens, but many cannot and/or do not want them. • Some have argued that there are both historic and suburban townscapes which are lower density will be harmed by high density proposals. There should be unambiguous rules about height and density of new building matching neighbouring buildings. Potential impact on historic skyline views and potential loss or world heritage status. A decline in tourism could result. • The average level of density of new dwellings being built is less than set out in Choices. A more detailed review of the Housing Study figures also raises questions over the number provided and their general applicability. The actual average figure is 63dph. When 2019 completions are included (i.e. 2008-19) this decreases to 59dph. When disaggregated, the average for brownfield sites is 70dph and 30dph for greenfield sites based on the gross area. The supporting evidence used to establish density is inconsistent. It is unclear	contributions based on a higher proportion of houses. An 80/20 ratio of houses to flats may therefore be more appropriate on greenfield sites, or at least a more flexible approach based on consideration of each site's specific circumstances and accounting for infrastructure. • If this approach is not adopted, then the land in question will simply not be developed or not be developed in phase with the need to deliver infrastructure. In that way, existing communities will continue to suffer from lack of investment and be prevented from benefiting from such investment all while higher numbers of new residents come into an area. • A capacity assessment based on "persons or beds per hectare" not "units per hectare" should be considered as it is the number of bedrooms which sets the real people growth impact on an area, not units. This approach gives flexibility to provide a wider range of housing stock with developers not being solely restricted to small dwellings to meet density targets but instead able to provide larger dwellings that can have more bedrooms.

36

2B. We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed.
Total responses - 805

Agree 64% (724)	Disagree 36% (82)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
vary and be identified for different areas and linked to current and planned PTAL ratings for example? • A further suggestion is the 65 dwellings per hectare proposed standard could be applied to urban brownfield sites (although some argue the 100 dwellings per hectare is appropriate for brownfield and others go further advising even 100 dwellings per hectare is too low simply mirroring the ten-year average in the city). • By comparison a lesser density range from 50-65 units per hectare for greenfield land releases in sustainable locations which are close to public transport and active travel routes. As detailed in the Urban Design Compendium, research suggests net densities of 100 persons per hectare are required to sustain a good bus service, which equates to around 45 dwellings per hectare based on UK average household size of 2.2 persons, albeit there is some flexibility. Other suggestions states densities should start at 30 dwellings per hectare or 40 dwellings per hectare is the least dense areas in line with current edge of settlement densities. • Varied densities also result in more varied types and tenures as well as better placemaking with varied characters in the places being created, with lower densities at settlement edges softening the visual and	why the average density of what has been built to date should be applied as a strict minimum henceforth, especially since the mean average leading to the 65 dwellings per hectare had a huge variation in densities as expected for different site areas and locations. Queries over the current density in the city and by city block? How does that compare to other cities? • Households will not able to find home which meets needs with more homogenous flatted housing stock in terms of types and tenures. Consequently the variety and hence proportion of buyers that can be catered for will be reduced, particularly for larger homes with gardens. This will limit ability to adapt to change. It also means there will be less demand and few homes built. In addition it will increase the cost of family homes and result in migration of families to neighbouring authority areas in line with market demand. This is less sustainable and goes against one of the fundamental principles of the Choices for City Plan 2030 which is to ensure Edinburgh is a 'a city in which everyone lives in a home which they can afford'. This is reflected in the Council's current guidance which requires that a minimum of 20% housing is provided for family use. A wider variety of new homes will also help to drive more moves in the second-hand market increasing choice and competition following a sustained period of low transactions volumes.	• Notwithstanding this, it will be essential that the other supporting evidence on education requirements is transparent, robust and consistent with policy and case law. We would expect these shortcomings in the evidence to be fully addressed to allow meaningful consultation. • Minimum densities should be in consultation with those promoting sites. • It should be clear if density is to take precedence over other policies such as those requiring greenspace. Some argue that it should be made clear density has priority in such cases. • Density must consider garden areas per dwelling with a flexible standard of rear garden to allow for building extension or adaptation. This may be assisted by early clarification of what the City of Edinburgh Council intends to apply as permitted development rights. • Shared transport provision with share bikes and car clubs work best in high density developments and could be a key to providing a means to travelling outward from high-density areas.

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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
landscape impact of new settlement edges for example. • The setting variable densities also allows account to be taken of urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space. • Place Briefs and masterplans should identify and design appropriately for densities (although some argue they remove the need for densities completely), with it added this should be done before finalising LDP allocations. With this being particularly requested for larger sites for example over 4ha and undertaken by the landowner(s) and Council supported by all necessary disciplines and statutory undertakers. • Murray Estates and 7N Architects argue it is possible to achieve an average density of 65 dwellings per hectare across the whole masterplan for Hermiston Park, with a variety of housing typologies/tenures, densities and neighbourhood characters. This will be essential to establishing a diverse and successful community for inclusive growth. Specifically higher density areas of apartment buildings and terraced houses are proposed at the core of the masterplan, focussed around new and existing green travel routes and proposed local centres. At the fringes of the masterplan, density reduces with a greater	• As an example of how dwellings per hectare equates to types of dwelling, Greendykes South has been analysed which is a development site being progressed by Taylor Wimpey located in the south-east of the city. The development will comprise 59% terraces, 34% apartments and 7% being a mix of detached and semi-detached housing. This is viewed as a particularly high density suburban development but only equates to 60 dwellings per hectare. • Requiring vertical mix of uses will have limited applicability. • Increasing density to deliver more dwellings on fewer sites is not sound reason to avoid releasing additional housing land. Some representors see the fact that less greenfield land needing to be released is a significant positive aspect of increased density. • Sites also may not come forward over concerns that the scale of density required could not appropriately fit within the landscape or townscape character of the site and its surrounding area. Delivery will be harmed by this policy change, which should be a focus of LDPs as per Scottish Planning Policy. • Density and services provision are also a financial consideration that will vary between sites. Whilst an increase in density may increase sales revenue and	• There is no explanation of the term vertical mix. What it will give in terms of meeting the needs of the market? Does vertical mix of uses mean housing above ground floor commercial uses? • It should be clarified this policy will not apply to sites that have planning permission or planning permission in principle. The standards should also not be applied to proposals submitted prior to adoption of Cityplan. • Possible tensions between business and residential uses in terms of amenity and building/fire regulations. • Vertical mixes of uses should be focused around particular centres and nodes where commercial occupiers would locationally need them and where their operations can complement residential uses. A requirement for vertical mix use in areas where there is a lack of demand for such a use could lead to an overprovision of commercial / retail uses in areas where there is simply no demand and which could lead to vacant units.

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Total responses - 805

Agree 64% (724)	Disagree 36% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
proportion of terraced housing complemented by semi-detached and detached dwellings. This creates a softer edge to the existing and proposed green buffers and landscaped areas. • This option, as with Choice 2 more generally, should explicitly link to the City Mobility Plan's mention of Mobility Hubs. Through provision of structured shared mobility with links to public transport connections, there is potential to reduce space required for private parking and increase extra floorspace within dwellings which is important for mental health, encourage longer tenure and thereby create stronger communities. The need for liveable space within dwellings should not be overlooked when considering density. • The policy must also be applied to commercial developments to prevent low density retail parks for example that inefficiently use land and encourage unsustainable travel . • Dense developments must be done with care to avoid a detrimental impact, however it is noted that well-designed, taller buildings can also create vibrant, exciting city centre Some comments state denser developments should be capped at traditional 4 story	community services provision, land value revenue accounting works when land can be developed allowing site values which can be 'shared' through community deductions. • Existing policy and Edinburgh Design Guidance (and SESplan) are adequate as they relate to the individual circumstance of a particular site and locality. • Policy on open space is rigid (particularly on private amenity space). If this were more flexible then the imposition of minimum density standards would become more deliverable. • In light of Coronavirus, the provision of high density housing has to be considered very carefully. Some argue more homes, or all homes, should have access to gardens. Shared stairwells, lifts and corridors inherently cause issues. • This will increase pressure on local infrastructure, services, amenities and green/blue spaces. Increases in density should only be permitted where there is a corresponding percentage increase in green spaces, amenities and infrastructure . • Much relies currently on the bus system. This is good, but is already overloaded. Conversely others note public transport may see a fall-off in use due to the	• Suggest that minimum densities are replaced with requirements to demonstrate that development proposals offer the most efficient use of land taking into account site-specific technical considerations and local context. • This will be a significant policy shift that planning officers must be prepared to discuss at pre-app stage, providing quantitative advice on density, scale and massing. • Many developers have a particular standard product in mind. Built in volume significantly reduces build costs and therefore price point Those products are also direct response to what people expect to get for their money. Consequently it is argued increasing densities, and thus house types, would impact on housing delivery. It has suggested a compromise density between current densities and 65 dwellings per hectare would allow the market and customers to adjust, with increases in density phased in over the longer term. • Will this apply to just private dwellings or to short term lets and student housing etc.?

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tenement level, although some recommend a cap of 5, 6 and 7 storeys.	crowded nature of the buses, trains etc, so this policy will need some serious re-examination. • This will just further restrict spacious housing as only being affordable to the rich. The net effect will be to accelerate social inequality in the City. • putting people too close together breeds contempt, resentment, hostility and discomfort. social isolation, crime, anti-social behaviour, loneliness, mental health problems, deprivation and all the social problems we have come to associate with high rise developments where there is no access to local facilities for shopping, work and entertainment. At a minimum one comment suggested that *all* dwellings must have covered balconies. • Are minimum development densities really a problem? Developers will generally seek to make sure they realise as much density/value as possible out of a site. It is imagined that the density issue goes the other way and that it is the quality of a development that needs more regulating (sufficient space/soundproofing between dwellings and appropriate levels of greenspace are provisioned for).	Opposition to it being used to create more short term lets in particular. • With lower ceilings to conserve heat, maybe 5 storeys could fit into what was only 4 before. • We must be open to reducing density in some over populated areas and getting a better spread of population across our city • How would this be enforced? Policy could include better communication with local communities to ensure the policy is working as intended - regular review. • COVID-19 and the inevitability of pandemics in future as well as living with novel coronavirus in the intermediate term, makes it unclear as to what a healthy urban density is • Where higher density can be shown to serve the needs of a community then it should be allowed, however sufficient daylight must be maintained to properties.

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Agree 64% (724)	Disagree 36% (82)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	• high density housing works in the city centre where sites are limited, land prices are high; perhaps less so at the edge of cities. • Not everyone rides a bike or takes a tram / bus to get to work. Some people just like living in Edinburgh and may work too far away to commute in this way (or at inconvenient times / shifts etc. • The higher densities proposed mean city centre will be unavailable for families. I think mixed use is desirable, rather than enclaves of the wealthy/ young/elderly. • Density has a detrimental effect on indoor air quality as well as congestion, traffic and pollution outdoors. • There is too much intensity of development and skew of property prices/ land value in certain areas.	• Making sure this dense accommodation is affordable would make this policy acceptable • Other solutions can create additional housing stock are suggested instead/alongside increasing density. These include: using short term lets for proper residential, converting retail to residential, converting student accommodation and office accommodation – all of which should happen now in light of Covid 19. increase density in existing structures. Simplifying the planning restrictions around loft conversions in tenements

2C. We want to revise our design and layout policies to achieve better layouts for active travel and connectivity. To do this we want to ensure that the places, streets and road layouts we create in development reflects our Street Design Guidance and the six qualities of successful places in Scottish Planning Policy in that they are safe and pleasant, easy to move around, are welcoming; adaptable, and are resource efficient

Total responses - 798

Agree 85% (682)	Disagree 15% (116)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Forms part of blue-green network. all development must consider how water will be managed and flood risk avoided. • Improve levels of wellbeing of students and residents, for example allowing young children to play outdoors. This is part of a sustainable environment and good placemaking. • This improves health, including respiratory illnesses resulting from increasingly air-tight housing. • This help students' links with the local community. This is important as they often return home without understanding of the local culture. This can improve the local economy and tourism. • This must be high quality open space and public realm, it should largely 'natural/open' with trees. A large multi-use communal area can be more useful and attractive than individual small gardens. • Space provided should improve active travel and public transport infrastructure.	• This approach is too broad and not based on evidence. It is not realistic on every site and may deter good development proposals, for example the reuse of a derelict building in a constrained area. This could adversely affect a main stream investment asset class is that the quality and design of its places and properties have improved and which attract students to Edinburgh, including after graduation. • Policies should avoid being overly prescriptive and therefore be criteria based and take account of surrounding character /uses (including existing open space in the area) to deliver the six qualities of successful space as directed by Scottish Planning Policy. Account should also be had for the differing nature of end-users of different developments. A blanket approach reduces choice for the community. Reference is made to planning decisions supporting this view. • Many people would rather have private gardens instead of larger shared spaces. • The stated objectives conflict with one another. Developers could exploit the contradictions between high density requirements (2B) and this proposal (2D) and many developers have questioned if both aims	• Proposition is too vague. Clarity on ownership and responsibilities towards the new areas of open space are essential to avoid neglect and degradation. • Much will depend on the detail of the policy, for example will it apply to urban as well as greenfield sites? It will be 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 will create uncertainty and add complexity and risk to the planning application process. It will backload the important process of prioritisation to the planning application stage. • Open space must also be generally public space, and with as few exceptions as possible be available 24/7 for all to exercise their rights and freedoms (yes, including rough sleeping etc). • Others however argue the opposite, particularly on flatted and affordable

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Agree 85% (682)	**Disagree 15% (116)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Part of ensuring housing density meets demand. • This is part of shift away from car use so that the limited ground space does not become overrun with congestion and car parking • Support from University of Edinburgh as it helps students to interact and build communities whilst forming part of safe and accommodation. • Spaces should not be plain lawns that are difficult to maintain. Food growing instead for example encourages use, teaching, community bonds across ages and provides good sustenance. • Student housing should have to meet the same criteria for internal and external open space as normal housing, ensuring its future adaptability to meet other housing needs as markets change. • Should such a policy be brought forward, there is a requirement within purpose built student accommodation that a percentage of open/amenity space can be internal to a building, rather than simply external. The internal areas however are not classed as open space however they provide a similar function in that they provide spaces for students to use when not in their rooms or flats. It is these internal spaces which	can be met. Questions over the calculation of any minimum density in the context of whether this is calculated on a gross or net basis would be significant in being able to provide sufficient open space as well as retain offices and then provide other infrastructure such as schools etc. This would be especially difficult for confined brownfield sites. • Some have noted this proposal for open space (2D) should take priority over density where both cannot be met. If both 2B and 2D have to be met then interior space may suffer and this may conflict with the character of existing community/area. • Do not agree with the inclusion of drying space as a particular requirement. • City Plan 2030 should continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. • It is important that the Council look at all of these in the round to arrive at a view of how this will affect delivery of development, in terms of timing and numbers, and ensure that this is reflected in the programming of sites in the supply to ensure the	housing developments, where residents require a safe enclosed space for their children to play and for clothes drying. Semi-private drying greens are part of the Scottish housing vernacular and should be encouraged. • A consistent approach should be applied to not just private housing developments but affordable and indeed student housing, although it is noted open space/public realm would not be appropriate in certain types of development such as industrial or retail warehousing. In these locations it would be unlikely to be useable. • The proposed option is broadly supported but should perhaps not be mandatory. • Combining art with the outdoors, which can also include creative planting and lighting schemes, can help to better create a sense of place and transform landscapes. The Council should support this more in policy terms.

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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
help deliver an overall attraction to students over and above other types of accommodation such as HMO's. • This can be achieved by taking account of new suggestions for design, for example, flat roof gardens. Removing spaces devoted to car parking is another	required minimum 5 year supply is maintained at all times. It is possible that, when reflected in the programming, this prompts a need for additional sites to be identified to maintain that supply and to avoid departure applications in response to a failing land supply that increases uncertainty for communities and the Council. An urban area only approach cannot be achieved with the policy aims set out. • LDP policy on open space provision should identify localities where no open space is required to support higher density housing as to do so would undermine place making objectives and risk the delivery of housing. The policy should explicitly exclude those locations from the open space requirements. • Some support drying spaces however others argue drying spaces often encourage enclosed green spaces which limits how it can connect to other active transport/ play needs etc. Others note that drying space is something hardly anyone wants or uses. • Inside drying needs to be priority instead - outside drying is only really possible between May – Sept (and even then many areas get insufficient sunlight). However term times are October to May so they are pointless. Drying areas can be done in well-ventilated	• Consideration must be given to practical aspects that may cause conflict, such as proximity and noise . • Disagreement over whether space is needed for students (with it also noted students can cope without drying space and have university facilities but others feeling student housing is especially in need of space. • Clearer definition on what is counted as useable open space. Often one metre strips with little function are counted. Instead spaces should be attractive with a particular benefit/function so to be useable. For instance, structural landscape, seating, street furniture, paths, play, exercise and other recreational facilities, etc. • Rubbish collection areas are often inadequately considered, resulting in litter blowing into surrounding area.

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Total responses - 798

Agree 85% (682)	Disagree 15% (116)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	cellars and basements, which should be mandatory for all new high density developments to encourage efficient land use. • Community appliances (i.e. washer machines, dryers, tools, ladders, etc) that serve a community are better than everyone in the community having one each.	

2D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, whilst allowing for higher densities

Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Forms part of blue-green network. all development must consider how water will be managed and flood risk avoided. • Improve levels of wellbeing of students and residents, for example allowing young children to play outdoors. This is part of a sustainable environment and good placemaking. This improves health, including respiratory illnesses resulting from increasingly air-tight housing.	• This approach is too broad and not based on evidence. It is not realistic on every site and may deter good development proposals, for example the reuse of a derelict building in a constrained area. This could adversely affect a main stream investment asset class is that the quality and design of its places and properties have improved and which attract students to Edinburgh, including after graduation. • Policies should avoid being overly prescriptive and therefore be criteria based and take account of	• Proposition is too vague. Clarity on ownership and responsibilities towards the new areas of open space are essential to avoid neglect and degradation. • Much will depend on the detail of the policy, for example will it apply to urban as well as greenfield sites? It will be important that policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting

2D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, whilst allowing for higher densities

Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- This help students links with the local community. This is important as they often return home without understanding of the local culture. - This must be high quality open space and public realm, it should largely 'natural/open' with trees. - Space provided should improve active travel and public transport infrastructure. - Part of ensuring housing density meets demand. - This is part of shift away from car use so that the limited ground space does not become overrun with congestion and car parking. - Support from University of Edinburgh as it helps students to interact and build communities whilst forming part of safe and accommodation. - Spaces should not be plain lawns that are difficult to maintain. Food growing instead for example encourages use, teaching, community bonds across ages and provides good sustenance. - Student housing should have to meet the same criteria for internal and external open space as normal housing, ensuring its future adaptability to meet other housing needs as markets change	surrounding character /uses (including existing open space in the area) to deliver the six qualities of successful space as directed by Scottish Planning Policy. Account should also be had for the differing nature of end-users of different developments. A blanket approach reduces choice for the community. Reference is made to planning decisions supporting this view. - Many people would rather have private gardens instead of larger shared spaces. - The stated objectives conflict with one another. Developers could exploit the contradictions between high density requirements (2B) and this proposal (2D) and many developers have questioned if both aims can be met. Questions over the calculation of any minimum density in the context of whether this is calculated on a gross or net basis would be significant in being able to provide sufficient open space as well as retain offices and then provide other infrastructure such as schools etc. This would be especially difficult for confined brownfield sites. - Some have noted this proposal for open space (2D) should take priority over density where both cannot be met. If both 2B and 2D have to be met then interior space may suffer and this may conflict with the character of existing community/area.	applicants with an irreconcilable set of policy asks will create uncertainty and add complexity and risk to the planning application process. It will backload the important process of prioritisation to the planning application stage. - Open space must also be generally public space, and with as few exceptions as possible be available 24/7 for all to exercise their rights and freedoms (yes, including rough sleeping etc). - Others however argue the opposite, particularly on flatted and affordable housing developments, where residents require a safe enclosed space for their children to play and for clothes drying. Semi-private drying greens are part of the Scottish housing vernacular and should be encouraged. - A consistent approach should be applied to not just private housing developments but affordable and indeed student housing, although it is noted open space/public realm would not be appropriate in certain types of development such as industrial or

2D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, whilst allowing for higher densities

Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Should such a policy be brought forward, there is a requirement within purpose built student accommodation that a percentage of open/amenity space can be internal to a building, rather than simply external. The internal areas however are not classed as open space however they provide a similar function in that they provide spaces for students to use when not in their rooms or flats. It is these internal spaces which help deliver an overall attraction to students over and above other types of accommodation such as Housing in Multiple Occupation.	• Do not agree with the inclusion of drying space as a particular requirement. • City Plan 2030 should continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. • It is important that the Council look at all of these in the round to arrive at a view of how this will affect delivery of development, in terms of timing and numbers, and ensure that this is reflected in the programming of sites in the supply to ensure the required minimum five-year supply is maintained at all times. It is possible that, when reflected in the programming, this prompts a need for additional sites to be identified to maintain that supply and to avoid departure applications in response to a failing land supply that increases uncertainty for communities and the Council. An urban area only approach cannot be achieved with the policy aims set out. • LDP policy on open space provision should identify localities where no open space is required to support higher density housing as to do so would undermine place making objectives and risk the delivery of	retail warehousing. In these locations it would be unlikely to be useable. • The proposed option is broadly supported but should perhaps not be mandatory. • Combining art with the outdoors, which can also include creative planting and lighting schemes, can help to better create a sense of place and transform landscapes. The Council should support this more in policy terms.

2D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, whilst allowing for higher densities

Total responses - 787

Agree 87% (685)	Disagree 13% (102)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	housing. The policy should explicitly exclude those locations from the open space requirements.	

Choice 3 – Delivering carbon neutral buildings

3A - We want to require all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. We will continue to require at least 50% of the carbon reduction target to be met through low and zero-carbon generating technologies

Alternatively we could require buildings and conversions to meet either the Gold, Silver or Bronze standard (Bronze is the current minimum) as set out in the current Scottish Building Regulations

Total responses - 748

Platinum 63% (469)	Gold 18% (135)	Silver 7% (51)	Current 12% (89)	
Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**
• Energy use in buildings in Edinburgh accounts for a significant proportion of all citywide carbon emissions and energy us. Platinum standard must be met for the Council to achieve the net zero carbon emissions as set by the Council's declaration of a climate emergency, the commitment to a zero carbon city by 2030 and the targets set by Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.	• No justification for this proposed policy. • Not achievable. Even many highly serviced buildings such as research institutes and laboratories are challenging at this stage to deliver as Carbon Zero. • A range of figures have been given for the additional capital costs for platinum: ranging from 10-15% and £40-£50'000 per dwelling. Others note this is simply			• Replacing a building has significant energy, carbon and cost implications. The retention of existing building stock is preferable when energy and carbon performance can be improved to reasonable level. • Funding would go further it were directed toward funding towards improving energy

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Total responses - 748

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Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**
• Current developments appear to have met the lowest possible environmental standards, with a slow progression in building standards to adapt to climate change. Edinburgh lags behind other UK and European cities, with Glasgow for example requiring gold standard to be met since 2018. This may now mean relatively recent buildings now need to be razed. Buildings should meet the highest possible standards. • City of Edinburgh Council can become exemplar for others and shows ambitious targets can be achieved. • This is supported as it means the installation of sustainable surface water management systems at property level such as green roofs, water butts, rain gardens, porous paving etc. whilst minimising impermeable surfaces and the volume of surface water entering piped systems. Water saving at times of scarcity is another important consideration. • Opportunity for Council to promote development of existing major City Centre buildings with 'green walls or roofs'. • Supportive however it is important that high standards are implemented as appropriate to each building in	unknown and likely to be high. This is especially problematic given the present economic uncertainty resulting Covid-19 and the other additional costs being imposed by Cityplan e.g. 35% affordable housing as well as rising construction costs and ongoing costs like VAT. CEC needs to do further work on the additional cost for increasing the standard (e.g. Platinum, Gold) for each aspect (e.g. water management) as well as whether supply chains can deal with these changes given this is also a concern. • Raising the bar in Edinburgh might result in reduced and slower housing delivery in Edinburgh in turn affecting economic sustainability. It could also encourage some developers to adjacent Council areas instead. This housing is already undersupplied and too expensive for many in Edinburgh. Delivery and cost of affordable housing would also be reduced. • Some have argued that higher standards should only be applied to greenfield sites given brownfield sites are generally more sustainable in their locations already. Additionally, brownfield sites are mostly costly to develop and therefore any additional requirements would make these less likely to come forward thereby losing the benefits arising from their			efficiency of the existing housing stock, which has a far greater impact on emissions. • Insufficient information set out in question. The term "platinum" standard requires further clarification. Platinum standard would create challenges as it has not been fully scoped out. The text under the sub headings in the current document is 'not currently defined' for all but Co2 emissions. • It is difficult to see how this transition can be made so quickly, including the carbon neutral status by 2030. Platinum standard should be transitioned in a step-by-step process. • Will this change affect only new applications? • Many have asked if this standard apply to conservations? Historic Environment Scotland note that, in some cases, exceptions or lower standards may be justified for converting listed, historic or other buildings of interest which could

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Platinum 63% (469)	Gold 18% (135)	Silver 7% (51)	Current 12% (89)	
Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**
question, for example to avoid increases risks of cold bridging and interstitial condensation. • If we do not achieve platinum standard now (with trial and investment) then we are locking in complex and costly retrofitting problems which only increase the economic, environmental and social burden of tomorrow as upgrading will ultimately be needed soon in the context net zero emissions future. We should welcome the requirement for volume house-builders to innovate, thus increasing demand for new technology, bringing down costs and making zero carbon a reality. • Should we be going further than making new buildings carbon neutral in order to off-set the fact it is often inherently impossible for many older buildings to be brought up to modern standards? • The new policy should reference the benefits of a fabric first approach and the range of zero carbon technologies and approaches available to ensure carbon neutral buildings are delivered. • The new policy should allow flexibility for future changes to standards which may increase in future.	location and other merits (e.g. contributing to the Council's preferred strategy) . • Aim for gold or silver as these improve the status quo but are more likely to be delivered. • LDP policies should align with Building Regulations otherwise there is a significant risk that different Councils will have differing requirements. Housebuilders and their supply chains would find it almost impossible to work in such an ad-hoc and piecemeal policy context. There is also a benefit of national consistency to offer economies of scale and avoid costly complexity. • This is not a planning matter. A new LDP policy causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource • Planning cannot deal with the level detail required to demonstrate compliance with sustainability standard in Building Warrant, particularly given that all 8 aspects of sustainability need to be demonstrated to achieve the highest levels - each with its own technical nuances (e.g. space heating, water management). The			adversely affected. Section 7 of the Building Standards Technical Handbook expressly excludes conversions. There could be detrimental impacts from imposing standards on buildings they were not intended for. These changes would also impact on the viability of conversion schemes which were already more costly than new builds due to requirement for the use of traditional materials, specialist skills • Some argue relaxing heritage planning restrictions, for example for out-of-sight retro-fitted solar installations on existing houses (e.g. New Town roofs). What is more important, the 'look' of a building or the environment/comfort/cost? • Others argue that policy should allow for different levels for different development - ae platinum for new build and silver for conversions / improvements of older properties

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Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**

- The wider carbon savings benefits of the project as a whole are pertinent and should be taken into account also, rather than solely an emphasis on the building itself. - If this is not in their budget, some kind of financial support should be given to the developer. - These targets must be mandatory as they require up-skilling and will incur costs to developer which means they will not voluntarily be complied with. - Setting the target will drive standards in the building sector to innovate and will drive competition. it will also stimulate economic opportunities in the market which will drive down costs and increase the skillsets to improve low carbon designs and products to go further in future. - The carbon emissions involved in the construction process need to be also considered, including the	planning system is already not functioning efficiently due to a variety of pressures it has. - Current Building Standards (such as Platinum, Gold and Silver) may become out of date as building standards are reviewed. Particularly so as any proposed Cityplan will only really begin to have an impact from circa 2024 onwards once permissions granted under the new LDP being to be completed. - New homes are now 75% more efficient than they were in 1990. Even since 2010 significant uplifts in Carbon Targets have been made in Building Standards. It is anticipated that 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. Scottish Government is also phasing in EPC requirements for residential property. This makes setting a Platinum standard now unnecessary. - Further representations note the Scottish Government has set a policy of requiring net-zero buildings for consents from 2024 and so Edinburgh's policies should gradually build towards this.	.Des 6 is too complicated. - Other representors have noted clear guidance needs to be provided on how to achieve energy and sustainability items in listed or existing buildings. Some representors have noted however the need for flexibility in this regard to deal with these situations on a case-by-case basis. - Ensuring the delivery of the Platinum standard for buildings and conversions is one part of the whole systems approach which the Council will have to adopt in planning for the city's future energy and resources consumption. This will require clear policy direction across all Council areas, especially planning, with further collaboration between departments such as building standards and planning and better engagement with internal and external stakeholders to deliver the necessary innovation and solutions to achieve this. - Our understanding of much to do with climate change and different materials is changing so the highest possible standard

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Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**
production of materials and transport/assembly on site. • We will need to deliver on passivhausese that are carbon negative to help off-set the fact that some of the older housing will never become neutral. • This will reduce cost to future home occupiers in terms of heating bills etc, which particularly helps poorer households. • Edinburgh would take the lead on a global stage by committing to this, both earning it extra tourism revenue and making it a hub for green businesses, although some are concerned a lack of local expertise could cause business to be lost abroad. • New buildings need to be designed and build to the highest standards are they can exist for 100 years or more. • With regards to heating and hot water there needs to be terms that forbid the consumption of fossil fuels in	• The proposed Policy provides no baseline date upon which standards should be measured. • Policy Des 6 Sustainable Buildings remains an appropriate policy for City Plan 2030, subject to amendments in the supporting text. • Policy should state sustainability requirements as an 'aim' and/or allow exceptions where it can be demonstrated the requirements make a development unviable (with some stating that the next highest standard that can viably achieved then must be met). Others have noted the plan should explicitly set out where exceptions apply, for example where the buildings will inherently allow energy recovery. It has also been suggested higher levels are an aim and that 'incentives' should be offered to encourage meeting higher aims e.g. reductions from other financial contributions to infrastructure. • This policy should include the need to upgrade homes which are being altered or extended given most emissions etc in Edinburgh will come from especially inefficient existing housing stock. Residents of these			now may not be as we come to understand the drawbacks of particular materials. • The requirement for storage space (for bikes/prams/ etc) would be better provided outside if possible. • How can private landlords and housing associations be held to the requirement for home office space remaining as office space rather than as an additional bedroom? (especially important now in light of Covid-19). Also, what would the implications of this be for the Bedroom Tax? All of this would need to be worked out in detail. It may be more straightforward therefore to provide this space within the hallway or an existing public room. • The requirement for a minimum level of study space will need to be reflected within the minimum floor areas within the Edinburgh Design Guidance. • Request that some discretion is applied for water butts for all dwelling with private

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Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**
individual buildings. We must encourage better standards of insulation to prevent wasted heat, district heating, wind and solar and ground/air source heat pumps. • Create comfortable homes rather than cold, drafty or damp houses which increase illness. • Aim high and you might settle on something satisfactory. If requirements get watered down at least it will be from a high starting point.	homes have money to upgrade given they are paying for extensions and alterations. • it is not clear that this is feasible without a commitment to developments such as district heating. Rural areas do not all have mains gas so have to use oil/electric or calor gas. • most landlords will withdraw from the sector because it is too risky and too expensive to be in it and Second if the landlords stay they will be charging the tenants a large amount to be living in their properties. • How can this be enforced given many of the changes are internal or could change over the lifetime of a development?			gardens. Could the water butt be provided within a communal garden where this in provided in addition to the private patio? Some small patios or paved areas have limited space and there are is no (or limited) soft landscaping. • How would new standards be applies, monitored and enforced? • This does not make any provision for charging points for electric cars. • Carbon accounting could be done where something like a section 75 agreement could be used to take money off those not meeting the platinum standard or with high embodied carbon or demolition waste, to build funds to improve the performance of existing buildings, or the energy infrastructure that serves them, would take us a step closer to addressing the bigger issues in a net neutral manner. • The most important thing is to insist on the reuse of already existing buildings. New

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Reasons for agreeing with Platinum	**Reasons for disagreeing with Platinum**			**Comments / other issues raised**
				build is the worst carbon footprint whatever credentials it has. Removing VAT on conversions would help and putting VAT onto new builds (this is matter for UK government but it should be lobbied for). • Set a standard that takes us towards net zero for 2040, but do not require it for 2030. • Forms of heating like log burners are meant to be carbon neutral but they destroy air quality for residents.

Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans in our communities

4A. We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, open space, biodiversity net gain and community infrastructure development should deliver Total responses – 766		
Agree 93% (715)	**Disagree 7% (51)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Place Briefs done at the start of the process explain what is to come and ensure community buy-in. • Place Briefs help convey he priorities and needs of local communities. The community may raise issues but they also suggest solutions and can offer insights to bring forward better planned developments. • This reduces community frustration at later planning application stages as communities input into decisions on these matters has been taken into account and communities can more clearly see how this has shaped things. • Place Briefs are in line with the Place Principal. They can enhance the environment, historic assets, tackle air pollution, address contamination, incorporate drainage system. They should account for design, landscape, views/ vistas to surrounding areas, tree/woodland planting, energy use, path systems, biodiversity, layout, transport, amenity spaces, sport/leisure, growing space and access	• Place Briefs will just generate local objections delaying and preventing investment, good design and layouts. If Place Briefs are to be done they must be done on the understanding that development is needed for homes, business and economic growth. Otherwise there will be unrealistic expectations and/or unachievable outcomes. • Policy Des 2 Co-ordinated Development remains an appropriate policy for City Plan 2030 subject to amendments in the supporting text. One developer has suggested there should be an increase the requirement on developers to prepare Place Briefs. A further developer suggested further engagement with communities as an alternative. • The Council will need to await the Examination Report before proceeding with Place Briefs to be certain what areas and sites they are to be working on to avoid aborted work, wasted resources and raised community expectations. • The additional lead-in time for development arising from the additional need for Place Briefs (estimated at an additional 12 months) needs to be reflected in the programming of sites to establish if a 5 year supply is maintained at all times.	• Queries over how many Place Briefs are envisaged? Further questions then raised over where will the budget will come from • There is no indication of how and when Place Briefs will be delivered. Effort should be made to deliver the Place Briefs before allocations are finalised. If they are to form part of the development plan this should be made explicit, and an appropriate timescale planned for. If they are to be material considerations the weight to be applied to them should be made clear in the LDP. • Where will Place Briefs sit in the hierarchy of strategies, plans and policies? The relationship between Place Briefs and Local Place Plans needs to be explicit from the outset in terms of which mechanism has primacy and which shapes the other. There is potential for confusion and potentially even conflict between these.

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Agree 93% (715)	**Disagree 7% (51)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
to local food, education and healthcare infrastructure. • This is important for rounded communities with identity and social cohesion which contribute to physical and mental health and provide high quality spaces for work, life and play. Edinburgh has the potential to be a series of nodes that are strongly connected with each other, allowing these 'mini-centres' to feed off each other, thereby becoming more vibrant. • Briefs are essential to delivering on the preferred urban area strategy and policy approach. • The Place Standard Tool could be a useful resource with local communities. • It will be essential that developers and landowners are involved in the creation of design briefs with their own perspective on site development and associated costs. This will help to avoid creating complications, ransom strips or holding up development with impossible requirements such as requiring infrastructure delivery outwith land controlled by the developer.	• There is no legislative requirement relating to community involvement in forming Place Briefs and so they should just to be prepared by the Council and consulted on. • Place Briefs allow developers to escape from their normal requirements and so policies need to be strengthened. • Place Briefs will be skewed to particular topics such as active travel as perhaps indicated by Choices options. • Communities will vie against each other (eg not wanting undesirable features in their own neighbourhoods) so some level of oversight/decision-making needs to be kept by qualified officers in local government. • People have high expectations and are overly idealistic, without taking into account the realities of problems. There should be clear differential between any additional burden which development places on an area, and that which already exists. • Planning officials should still be the main guides. However it is important they actually come and really look at the places that they are thinking of building. Visit at different times of day find out what it's like to live there good and bad. Councillors should do this too.	• For the meaningful and inclusive delivery of Place Plans considerable support will be required at community level if residents are to play an equal part in the preparation of Place Plans. The Council will need to provide additional funding for undertaking engagement and providing skilled resources (e.g. transport and biodiversity, HRAs etc.) to advise local communities when developing Place Briefs. • A formal structure should be established setting how communities shall be involved in Place Briefs. The success of Place Briefs and their format should be reviewed as they are rolled out so as to refine the process. • For larger sites the information produced should be more detailed, with a focus on development frameworks and draft masterplans, necessary to co-ordinate delivery of more complex place-making. • Many representors have noted that Place Briefs should be a requirement for all sites. Some representors, mainly developers, have

4A. We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, open space, biodiversity net gain and community infrastructure development should deliver

Total responses – 766

Agree 93% (715)	Disagree 7% (51)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Service Providers such as Scottish Gas Networks need to be involved in the process to provide comprehensive information assessment where constraints and limitations are fully known, shared and accepted by all parties. There is concern constraints that are later found out could unravel Place Briefs. • There is benefit in bridging the gap between the LDP and Planning Applications. Site briefs should provide specific information as to how development areas should connect in and how they should contribute to the wider green network, including where necessary, through appropriate use of off-site contributions. • The process of being involved in Place Briefs will be a helpful process for communities who may in the future prepare a Local Place Plan. • City of Edinburgh Council must provide adequate finance, accommodation, professional guidance, and professional indemnity insurance for those involved. • Ensure alignment between area specific briefs and the policies of the LDP.	• This will cost too much and represent excessive regulation. • There is a danger that this will magnify inequalities and more affluent areas tend to have people with more time and ability to take part. Community Council annual grant is insufficient to support this work. • There must be sufficient funding for time to pay for salary for a coordinator of the plan and out of pocket expenses (e.g. free transport) for those who would find it difficult to engage otherwise. • Place brief areas shown in the Choices document are excessively large in relation the areas shown as development proposals. They take in areas which are currently developed and do not need any place making.	argued that additional consultation are more important for larger, strategic sites and those which are complex/in multiple ownership. For less contentious major developments then there already statutory pre-application consultation that involves the community. It has been stated that Place Briefs should dovetail into existing pre-app processes. • It is difficult to motivate people to participate in local consultations. Community Councils face difficulties in filling posts and in demonstrating that they can represent the community. Scottish Government's overruling of Edinburgh planning decisions raise concerns that local input carries little weight. Earlier lack of consultation with Communities on future developments which has created a lot of mistrust. All householders in an area must have the relevant information delivered to them in order to properly communicate/attend any meetings. • A formal structure should be established setting how communities shall be involved in

4A. We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, open space, biodiversity net gain and community infrastructure development should deliver Total responses – 766		
Agree 93% (715)	**Disagree 7% (51)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• There should be no removal of local shops and small businesses to build more houses when this will be at the expense of local amenity, employment and access. Local people should have a say when widely used facilities are threatened with removal. • Give communities more opportunity to attempt "community right to buy" purchases on buildings that they feel would be best put to community use. • New development should include a place brief so that all local development in the area is tied together and is seen in the context of local village or town centre where all amenities are within 15 min walking distances. If this is not possible then people must be able to use low carbon transport where they need to travel further . • Through a series of meetings, workshops, surveys, and growth-scenario comparisons facilitated by local leaders, Place Briefs allow participants create a community vision—a written statement that reflects the community's goals and priorities and describes how the		Place Briefs, with community groups involved in this. This should set out what extent of areas Place Briefs cover. The success of Place Briefs and their format should be reviewed as they are rolled out so as to refine the process. • It has been argued that Community Councils should provide community input. Many others have noted communities have diverse views and that all parts of the community must be involved. This requires using innovative methods to involve those who are presently marginalized and under-represented. Suggestions to address this include workshops organised by the council as well as including local businesses, churches/place of worship, voluntary association. The Council should not treat an absence of consensus as grounds for it to act as arbitrator. • Briefs should cover all Council functions and responsibilities, including partnership arrangements e.g. Edinburgh Integration

4A. We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, open space, biodiversity net gain and community infrastructure development should deliver

Total responses – 766

Agree 93% (715)	Disagree 7% (51)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
community should look and feel in years to come. • Briefs should consider both existing and future residents.		Joint Board for Health and Social Care as a whole systems approach. • This should be an ongoing discussion, and the plans that are currently in development may well need reconsideration post Covid. • There is little local community involvement in Pre Application Consultation led by developers and they will not always allow members of public enough scope to get involved. Developers should be required to facilitate more involvement.

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions

17 comments

Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• This bring benefits to local communities in terms of feeling that they have more say over future development proposals as well as creating a better sense of connection to their local area.	• It is important that local place plans facilitate and do not delay development in what already appears to be an overly-ambitious timetable for the delivery of housing. • Issues relating to feasibility and viability need to be considered in accordance with the statutory provisions of	• Existing community engagement processes and activities with community-controlled organisations must be significantly strengthened and fully resourced. Significant support across community councils and organisations as well as developers that Local

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions 17 comments		
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• The new Planning Act enables Local Place Plans to be proposed by local communities and so proactive engagement by the planning service is essential. • Local Place Plan's must be positively prepared, supporting growth to meet the identified need, and prepared within the current planning policy framework. Others argue that there should be no housing developments until LPPs are in place. • Various key agencies (e.g. Historic Environment Scotland) have expressed support and willingness to engage with the LPP process and provide information to assist. • The Place Standard tool is recommended for Local Place Plans to allow thinking about the physical elements and the social aspects of a place together in a structured way by asking a series of questions based on the evidence. This provides a framework for evaluation, for assessing the strengths and weaknesses and for prioritising areas for action to improve new and existing places. The standard should also include the importance of local food growing and access to it.	the Act the Circulars and Regulations. The success and failure of community involvement efforts in implementing Local Place Plans can be linked in part to a community's level of readiness and existing level of social capacity and of course, a willingness to engage to deliver rather than oppose development. • LPPs must not misinform the design, layout, and transport, education and healthcare infrastructure requirements needing to be delivered given there may be overarching city-wide coordination required. • Historically there have been consultations and co-commissioning carried out multiple times and asking similar or identical questions with no tangible outcomes. This leads to disillusionment among participants and a lack of engagement from the wider community. • As effective consultation with local communities can be difficult to achieve so the process needs to be fair and open in terms of options and agreed outcomes. • There will be some areas in Edinburgh that have the readiness and capacity to undertake these Local Place Plans. However, there will be some that do not. • Some Community Council's may be inactive and so some areas may not be represented.	Place Plan preparation is professionally supported (e.g. landscape, architecture, biodiversity etc) with specialist input including with up-to-date data. This is important to ensure communities are aware of what LPPs can influence. • A clear framework, process and timetable should be established for development of Local Place Plans. Several representations said community groups should be involved in deciding this methodology. One comment noted that not all LPPs will be identical in this respect so a standard template would not work. The triggers for which community bodies should be involved may not follow arbitrary boundaries. • The Community Council should be seen as a partner and a key consultee - if not a statutory consultee - on all planning matters for their area. Many comments note participation needs to be wider than Community Council however and that many areas do not have a Community Council.

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions		
17 comments		
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• A revised version of the Place Standard tool will be launched in 2020 to address gaps in the original tool identified in a changing climate, including enhancements to better enable place-based conversations to address climate change and improve environmental sustainability.	o Conversely however it is argued at present it is disadvantaged communities which are overrepresented with LPPs and that LPPs should be done for better-off areas too.	• Others have argued the best manner in which to engage with existing communities is through an existing landowner or custodian of a particular area. In particular they note the Council is not resourced to handle the additional workload
• Consideration of green and blue infrastructure should be encouraged.	• Community Councils and other local bodies are elected for a period of a few years and can change much of their membership accordingly and because they do not have a paid executive are unlikely to be able to provide the continuity desired. Council officers have to act quickly in order to see things are done within the period for which community council officers are elected.	• Local Place Plans will need to integrate with the statutory procedures and development management process. LPPs should be seen as a means of facilitating delivery and involving all key stakeholders in implementation - including landowners and developers - as well as key organisations and service providers. This is particularly relevant for the larger strategic land releases. It has been stated that LPPs development should include small business owners as well as other community members and all participants should have equal voting rights.
• Comment suggesting lots of local communities are keen to do Local Place Plans. Leith is underway with this process already. Many community organisations have also noted Communities have limited resources and time however. The introduction of Place Briefs, if a mandatory requirement, would cause for concern.	• Where will the Council funding and resource come from to support LPPs? How would the Council choose which ones to support if funding was limited? How many could be many coming forward? If every Community Council decided to prepare a Local Place Plan, as is its right, how would the Council respond to this?	
• It noted there is a chance for enhancing skills and capacity in communities to compensate for officers who do not currently have the capacity to deliver the massively expanded network of walking and cycling routes, paths and related infrastructure.	• LPPs should be more action focused than existing examples which seem lacklustre, devoid of inspiration and limited in scope.	• The new Planning Act indicates that Councils merely have to show 'due regard' for LPPs which could give them very little weight. Developers note that the LPP requires to adhere to the LDP so a new policy must take care in terms of the weight given to LPPs, with the purpose of LPPs should be to guide,
	• There will also need for mechanisms for resolving areas of disagreement between communities and the Council. LPPs	

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions			
17 comments			
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Place briefs appear to be a good concept for delivering Local Place Plans, or have the flexibility to respond to them, in cases where the Place Brief is in place before the Local Place Plan has been developed. • They should also be seen as a tool for education on important citywide issues. Evidence shows that providing increased awareness of options available amongst the community increases the buy-in to those options, in particular regarding innovative travel options. It has been suggested that the process to develop these plans should also include setting targets to 'work towards delivering a sustainable city' etc. • LPPs should holistically consider infrastructure and amenity needs of an area at an early stage. This improves communities but also nurseries, libraries and small commercial units need to be created if smaller enterprises are to establish • Edinburgh Council should set out that these plans will be taken strongly into consideration during decision making.	should not be prevented from happening because they do not match the views of council officers. • What if several LPPs are drawn up for one area? What if they do not comply with the LDP? • LPPs must be constantly reviewed and updated, maybe every 6 months	not prevent development. Others note however this emphasises the importance of having an LDP that reflects the views and aspirations of the Edinburgh's communities in its high-level aims. • Conversely however it has been stated Council must fully take account of LPPS as one of the most important considerations in planning decisions in creating Masterplans, Place Briefs, in discussions with developers, and dealing with PANS and Planning applications. • The preparation of the Local Place Plan may have the benefit of concentrating a great deal of discussion, argument, understanding and resolution in a very short time. • It will be important however that the planning and design process come neither to early nor too late to inform subsequent stages of planning and development. • What are the plans to find out what the 'community ambitions' are? Will these encompass the consultation already carried

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions 17 comments		
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Edinburgh Council should strongly consider Local Place Plans as a core mechanism for realising its climate and biodiversity objectives and surpassing them. • Officers should use a locale's public transport and active travel routes so that they know the reality of what it is to travel and live in each community. • Link LPPs to participatory budgeting – given a share of local government money to vote on its use in relation to delivering the plan. o Community should be able to deliver aspects, not be in the back seat of development		out through the Local Outcome Improvement Plan? • The 'planners' involved are from diverse backgrounds • There has to be better research of local demographic, historical significance of land/communities, infrastructure etc. • Guidance for 'Local Place Plans' is yet to be provided by the Government so further comment is not possible at this stage. • There has to be an end to the confidential and one-sided system of developer/planning office meetings, which are not open to public scrutiny or participation, nor are reciprocal arrangements allowed for residents or residents groups. This is undemocratic and has to be amended, to have all developer/council meetings minuted, and those minutes made publicly available. • A very wide range of suggestions have been put forward on how to engage on LPPs. There are too numerous to be listed here however

4B. We want to support Local Place Plans (LPPs) being prepared by our communities. City Plan 2030 will set out how Place Plans can help us achieve great places and support community ambitions 17 comments		
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
		each suggestion has been recorded to take into consideration going forward.

Choices for City Plan 2030 Responses

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

Aim – to realise the lifelong health benefits of walking and cycling by creating streets and public spaces for people over cars and improving and expanding sustainable transport.

Choice 5 – Delivering Community Infrastructure.

5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements

Total responses - 766

Agree 92% (702)	Disagree 8% (64)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Proactive forward planning is needed to ensure capacity is managed. - Provide an explicit 'infrastructure first' policy. - Recognises the strain of new development on existing services. - Given that resources are constrained, and likely to be so in the future also, it's important to concentrate them as effectively as possible. - Logical approach and one which is supported by Scottish Planning Policy and the current LDP. - Positive outcome to deliver within communities, helps social cohesion and empowerment especially if integrating choices 1, 6, 7 and 8. - Strong support for new non-denominational Primary Schools and a new Secondary school in North Edinburgh – Leith specifically. - Supports and encourages the approach to align spatial planning with future community health and social care needs.	- Needs of the motorist must to be considered and that road infrastructure improvements will be required and must be implemented before development starts in many rural areas. - No reference to healthcare or assisted living of the elderly as a key infrastructure with shortage of provision. - Not deliverable because it will not provide a range and choice of housing types and tenures across the City . - The planning of future health care services is a matter the NHS Lothians to address and not developers. Subsequently, contributions should not be sought. - Do not think extending the tram should be part of the network. Spend that money on resourcing electric bus development - and green electricity.	- Sites with planning permission in principle should not have new requirements retrofitted at detailed or reserved matters application stage. - Too great a burden on developers affects viability and may result in sites withdrawn from the market. - What's needed is a regional strategic statutory plan for the Lothians planning housing and therefore infrastructure at a regional level not local level. - What about places that don't have infrastructure which is badly needed, shouldn't these locations also be considered? - Unfair to add any more pressure to our primary healthcare system by unnecessary development in Edinburgh South in particular.

5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements Total responses - 766		
Agree 92% (702)	**Disagree 8% (64)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Support sites that demonstrate early delivery of infrastructure. • High density, mixed use development reduces the need to travel and is infrastructure efficient, especially if supported by increased public infrastructure provision. Relate density levels to high public transport accessibility. Mass rapid transit reliant on move away from low density suburban housing model. • More residents' homes in city centre reduces pressure on transport infrastructure from commuting patterns. • Public transport works best when development is concentrated at nodes.		• Futureproof new infrastructure as much as possible since the capital outlays for new infrastructure can be considerable within the limited budgets. • Have the plans taken into account the pandemic? Are they based on assumptions about where and how we will work, move, be educated? Surely a city immobilty plan is more likely to be on the agenda. Less space will be required for healthcare if more virtual meetings take place. • Existing roads and transport are at maximum capacity so there could well be an argument to move new development to other areas with new transport links which might also relieve the existing routes. • Transport infrastructure should include on-street e-bike and cargo bike secure storage, particularly in tenement areas / for those living in shared buildings. • Integrated transport is a must - allow bicycles on buses, ensure more bicycle spaces on trains. • Burnshot Road is currently experiencing a traffic volume of 2.5 times the national average. Need a solution to Kirkliston congestion, and more reliable bus services.

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Agree 92% (702)	Disagree 8% (64)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• Start up a Council run area of goods delivery, a complete ban on coaches within the city. • Private schooling is a big issue in Edinburgh and those schools must ensure they also support environmentally friendly transport on a daily basis, if more children went to local schools it would make a big difference to traffic and air pollution. • If the local area is attractive and has the amenities people need if will encourage people to live and work locally. • The effect of any infrastructure changes will impact the city for many decades to come. You should be planning out to 2050 as a minimum. • Move the hospitals back into 'central locations • LJV boards should be set up to provide all current and future transport provision; probably for all the Lothians, not just Edinburgh. • Edinburgh is severely lacking in accessible public transport: Lothian buses do not allow mobility scooters on-board, pavements are in very poor condition for wheelchairs, walkers/rollators. All this contributes to the isolation of elderly people who don't have

5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements Total responses - 766		
Agree 92% (702)	Disagree 8% (64)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		cars, and to the increased use of cars and taxis. Transport Corridors: • Concern over ESSTS corridors deliverability due to changing economic circumstances. Focus on more relevant walking primarily, then cycling routes. • All four corridors identified in ESSTS should be identified and planned for in City Plan 2030, and development on these corridors should be supported. • Fundamental arterial route into Edinburgh (A90 from Fife) has been ignored in in the ESSTS. • ESSTS doesn't adequately consider existing rail capacity, e.g. Curriehill services. • Corridor 8 misalignment between mapping in Map 3 in Choices and Figure 9.1 in the study, affecting the housing study assessment/Strategic Environmental Assessment. • ESSTS lacks sustainable orbital movement options, linking park and ride sites and key employability sites across an east-west arc.

5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements

Total responses - 766

Agree 92% (702)	Disagree 8% (64)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• Concern over the timescales to deliver and fund tramline 3 and risk that development precedes transport solutions. • Corridor 3 is only part of the transport infrastructure on SE Edinburgh - heavier traffic arrives via the Fairmilehead and Straiton routes at rush hour. Kaimes and Fairmilehead junctions are identified in the City Mobility plan as congestion areas, but equally poor is the complex junction at the foot of Liberton Brae. Corridor 3 should have 3 souther forks, via Straiton, Sherriffhall and Fairmilehead. • In line with Edinburgh's vision of decarbonizing, the Edinburgh South Suburban Railway would be able to play a major role in connecting the suburbs with the city centre and each other. With clever re-arrangement of transport services and with the use of transport interchanges at key locations, there will be no need for a significant amount of trains to pass through to Waverley. • Extend tram to Portobello. Education: • Publish education infrastructure appraisal in advance of the Proposed Plan.

5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated (deliverable within the plan period), encouraging improvements
Total responses - 766

Agree 92% (702)	Disagree 8% (64)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• Prioritise sites within the Council's ownership. Don't adopt a standard land transfer cost or expectation, as the current Local Development Plan does, because every site is different. • Welcomes the proposed provision of new education infrastructure in Kirkliston. • Recognise that social housing is likely to house considerably more adults and children than an area with an equivalent density elsewhere. Therefore, base any density standards on the number of bedspaces per hectare rather than dwellings to take into account full occupancy of social housing. • Justify education contributions and pupil product: high-density developments at over 65 units per hectare is unlikely to be deliver family housing; likewise where age profile of the development doesn't merit. • Significant uncertainty as to the ability to deliver new high schools in the plan period, despite Housing Study concluding some sites as being 'potentially suitable for development'.

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Agree 92% (702)	Disagree 8% (64)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		- New schools should not be built on greenspace, instead should provide new greenspace and growing/planting space. - Urban school sites may have restricted outdoor space whereas greenfield sites can deliver community based facilities for greater community use. - Active travel planning for access to schools is fundamental from outset. - Ensure no school catchment area changes. Split sites or use Compulsory Purchase Order powers to extend if necessary e.g. Kwik Fit buildings adjacent to Boroughmuir. - South Edinburgh needs a new High School. - Significant expansion of Gaelic language school provision. - Not clear from the Council's assessment that the cumulative impact of current large-scale housing developments in South East Edinburgh have been adequately dealt with.

5B We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services.

Total responses – 770

Agree 95% (735)	Disagree 5% (35)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Primary healthcare needs to be accessible for public and staff, and for health and wellbeing, active travel and public transport routes are key. - Safe active travel as a default option when accessing community infrastructure and use national user hierarchy for streets. - To minimise carbon emissions and create a healthier and pleasant living environment. - Important that investors and developers are as certain as possible about the requirements that will be required for new developments. - Where possible provision for parking AND electric car charging should be included. Cars will not stop being part of this city's transport infrastructure and support for electric cars is crucial to reduce carbon and local emissions. - Having community facilities well connected to active and public transport facilities makes them more accessible to a wider proportion of the public. Those already experiencing social isolation, for example, might be even more put off from accessing the facilities they need if they are difficult to travel to. - It's an equality issue really - if there's no public transport then the poor, the disabled and the elderly are less able to make use of facilities,	Existing infrastructure already exists around current catchment areas - any solutions should be based on existing catchments. The council must future proof new schools to ensure there's the potential for expansion. If there's not, new houses should not be built within catchment.	- Excellent public transport will reduce the need for private journeys, but good quality roads are also essential for times where public transport is not appropriate. Careful consideration should also be given to the traffic impact of new developments on existing traffic flows - e.g. Junctions/Interchanges. *existing* community facilities should be upgraded wherever possible, to alleviate the pressure on areas that have already accommodated additional development. - Need to consult with local community groups or will it be top down telling people what they think. - While there is an emphasis on active travel, the current crisis is showing that we can work a lot more from home and need to source local food, access local natural amenity and are able to interact in the local community more. We need to consider how home working and localism is accommodated. The community facilities need to be near to people and in the hub of the community. - The active travel routes must be direct, dedicated, segregated, and high quality

5B We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services.

Total responses – 770

Agree 95% (735)	Disagree 5% (35)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
and if they're not connected to active travel routes then there is a public health aspect that has not been optimised.		(unlike the wavy surface of, for instance, the cycle track at St Leonard's by the police station). Use proper design policies, and set out standards based on already established active transport guidance from successful places in Europe. Integrate this in the main road design policy, and ensure that all developments are done bearing in mind active transport. An active transport road design committee should be set up that overlooks the implementation of these policies in all future projects, and ensures that these are delivered properly.

5C We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel.

Total responses - 766

Agree 93% (713)	Disagree 7% (53)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Supports a high walk-in population and reduced need to travel, and the less need for car ownership. • Aids successful placemaking.	• The volume of travel to these facilities doesn't justify much expansion. There are already many local offices delivering these services in Edinburgh. Also many of these services could be done online now which requires no travel.	• Choice of active travel can be more inclusive. Provision of share bikes and e-bike share could help those that cannot walk quite so far.

5C We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel.

Total responses - 766

Agree 93% (713)	Disagree 7% (53)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Co-locating community services in some of the new allocations as part of a strategic network of agreed healthcare and other community infrastructure should then be identified in development briefs in City Plan 2030. - This supports the development of a greater number of hubs to deliver social care locally. - People want affordable facilities, open at useful time, within their own communities. - Will support carbon emission strategies and contribute towards effectively building sense of community in new developments	- Centralised services are more efficient and rovide a higher level of care. Localised services often lead to differences in quality between the services offered depending on the income levels in the area. e.g. dentists/GPs in certain areas, schools reflecting the income levels of the areas they are in. This can reinforce income related stereotypes and social stratification. - We need better online services not more locations. - The centre of Edinburgh is unique and has to be used by the local population. The idea of local community services sounds good, but almost inevitably, they will be starved of the resources they need and we will be left with nothing.	- Like to see the City Plan committed to the idea of a '20 minute neighbourhood'. Its the right method similar to Paris were the plan is to be able to get everything you need within a 15 min walk. - Community services should ideally be within active travel distance of all residents and services hub should be at the heart of each community. - People want to get to services quickly. - Provide on-street logistics hubs (with lockers) to reduce traffic from delivery vans and to support shop deliveries. - It's important that we avoid the need to always travel into city centre for services that could be delivered locally. - Make it easier for low-paid workers to live near their city-centre workplaces. - Primary Care services should be at the heart of communities they serve- both in terms of accessibility for the public to services and for the delivery of services by teams who require to do home visits e.g. GPs, District Nurses, thereby reducing travelling times. - To deliver services locally, hubs for social care staff to interact with communities,

5C We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Total responses - 766		
Agree 93% (713)	Disagree 7% (53)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		currently these are larger hubs that serve wide areas where transport is essential to meet people's needs. So redesigning how social care work across the city will be crucial to delivering local services. • More imagination about how buildings and facilities are used. • Centralised services has been a disaster for healthcare with long journeys to Western or ERI, same with decentralised to out of town retail. • People working in the services may still need to commute. • It should be recognised in policy that there will be opportunities for smaller scale development to be located in less accessible areas.

5D1: We want to set out where development will be expected to contribute toward new or expanded community infrastructure.

Total responses - 748

Agree 95% (708)	Disagree 5% (40)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Welcome clarity at the plan stage on what infrastructure will be expected to be provided. - Clear and transparent contribution expectations are important for developer and investor confidence and infrastructure requirements should be identified in the LDP and clearly justified. - We support this provided it is clear what the benefit is to that development. - Recognising and addressing the impact of the additional growth on primary care infrastructure through contributions will enable appropriate and timeous delivery response. - A full deliverability and viability assessment should be undertaken to determine whether or not the developer contribution contained within the whole plan are affordable within individual market areas within the city. This will prevent such contributions from precluding much needed development from coming forward and delivering the aims and objectives of the plan. - To be viable, City Plan 2030 should allocate development sites that are strategic in scale and offer the potential for community infrastructure to be required and well utilised. - The level of developer contributions should be raised considerably. We are emphatically clear	- Do not agree with contributions being required towards healthcare facilities that are run as private practices. - Concern over the Education Appraisal accompanying Choices in its density assumptions and consequent overestimation of pupil rate, with infrastructure requirements significantly overstated. - Fundamental that new programmed allocations identify what infrastructure is required, when and where, in consultation with Homes for Scotland and its membership.	- Consider impacts that new development may have on the existing rail network. Large residential developments that rely upon current rail capacity can both individually and cumulatively impact on the strategic function/capacity of the network. Impact on the network must be assessed as many routes and stations are operating at capacity. Commensurate increases in services or capacity may be required to avoid congestion. - Set out how much delivery will be funded by public funds (understand financing, and financial gap). - Developers can benefit significantly from the enhanced development value of green field sites and, in these circumstances, should be prepared to make appropriate contributions towards the costs of infrastructure. - Infrastructure contributions from developments on brownfield sites need to be carefully assessed so as not to discourage the reuse of such sites by developers. - Community input and engagement is key and critical to success.

5D1: We want to set out where development will be expected to contribute toward new or expanded community infrastructure.

Total responses - 748

Agree 95% (708)	Disagree 5% (40)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
that developers of student accommodation must be required to contribute equally, alongside developers of all other types of housing etc. • Developers must be part of the solution to delivering on community aspirations. • Where the plan lays out potential areas for development it should absolutely detail the requirements on the developing of the site- rather than waiting for applications to be submitted and then considering contributions. This would save time and money and would be more transparent.		• Deal with on a case by case basis commensurate with the location and scale of any particular development. • The current crisis is showing that we can work a lot more from home and need to source local food, access local natural amenity and are able to interact in the local community more. New development need to contribute to community facilities that need to be near to people and in the hub of the community.

5D2 We want to use cumulative contribution zones to determine the infrastructure actions, costs and delivery mechanisms

Total responses - 667

Agree 79% (530)	Disagree 21% (137)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• 'Cumulative contribution zones' recognizes that developing the city and meeting the challenges faced by this plan is a combined and shared endeavour. • By taking a cumulative approach over an entire zone, the opportunity to avoid delivering	• Contribution should be applicable only in the area under development. • Notes complication in the process if developments happen at different times and infrastructure will be held back. There is no doubt that substantial public investment will be needed in infrastructure improvements and	• Partnerships, using a mixed of funding streams, working together to enhance existing or create new water environments and habitat networks will be a key element for success. • The principle of cumulation should be applied at the proposal and application

5D2 We want to use cumulative contribution zones to determine the infrastructure actions, costs and delivery mechanisms		
Total responses - 667		
Agree 79% (530)	Disagree 21% (137)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
infrastructure because the site is too small to deliver, is reduced. • Sharing of infrastructure costs may unlock development in areas where initial infrastructure investment is too great a burden for one developer. • Where the total cost of delivering necessary infrastructure improvements in a wider area would fall disproportionally on one development then sharing these costs proportionally and fairly between all developments which fall within that area seems appropriate. • Enables a more strategic approach to the location of mobility hubs across a zone. • This will enable optimisation of community infrastructure and ensure consistency.	expansion and there is a limit to what new development can support without adversely affecting that market and its price structure. • Do not support use of cumulative contribution zones, and in order to establish that contributions relate to proposed development or as a direct consequence, a robust evidence base is required to demonstrate this relationship. • For reasons outlined in the Ministers direction January 2020. • Agree in principle the cost of infrastructure should be shared equitably but not all development sites are equal, site specific costs depend on a range of factors and land value. Higher abnormal costs, lower returns. What if the council actively flexed contributions to strategically stimulate housing delivery, effectively cross-subsidising more complex sites from elsewhere across the city? • Complications might arise with the implementation of this proposal, if there is disparity between the viability of the various developers involved in a particular zone. • This has no basis in current planning law and practise and there are a number of legal cases that reaffirm this point. • Recent appeal decisions show that there is a weakness in the current "contribution zone"	stage with regard to developments over 0.25 hectares. • Negates argument of financial viability if costs are shared proportionately. • Onus then on Council to manage contributions and deliver. • Scottish Water has a separate funding mechanism to deliver network and strategic infrastructure. • Full deliverability and viability assessment should be undertaken to determine if contributions are affordable both within the whole plan area and within individual market areas. • Appears like the integrated approach but needs clarity on methodology on how cost is shared equally and what happens when there is a time lag between developments in a zone. • Network Rail would welcome a rail improvement zone approach (see East Lothian) along with Scotrail, are keen to be involved in identifying the infrastructure requirements, costs and delivery mechanisms as a result of new development. • An appraisal should occur of the approaches to planning obligations across the

5D2 We want to use cumulative contribution zones to determine the infrastructure actions, costs and delivery mechanisms Total responses - 667		
Agree 79% (530)	**Disagree 21% (137)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	strategy and without changes in legislation the cumulative approach to contributions will continue to be challengeable. • Council is therefore needed to demonstrate that its approach to contributions meets the various tests in the Scottish Government Circular including that contributions need to relate to the proposed development and be proportionate. • There is a "danger" that the contribution zones could extend beyond planned areas for new development opening a door for developers to press for development of addition unplanned areas within the cumulative contribution zone. The boundary of contribution zones should coincide with planned development areas. A ten year plan can provide for this by delineating land for development (say) years 0 - 5 and years 6 - 10 and for the contribution zone to coincide with the boundary of land planned for development in years 0 -10	constituent SESplan authorities. Planning obligations should also be set in context of proportionality and affordability to ensure development viability. • Potential to test the infrastructure levy approach including cumulative contribution zones, using existing regional partnership forums. Scope zones with SEStran/infrastructure providers so zones and costs are not established in isolation. • Delivery must be communicated to communities, and don't miss the more immediate off-site requirements for larger cumulative actions. • Affordable housing developments led by housing associations (as opposed to S.75 affordable housing) should be exempt from contributions as in effect they are already providing 100% community infrastructure in the form of affordable housing. • Clarification and simplification is needed on the basis for developer contributions with much better enforcement of agreements. • A transparent pathway of where money is spent, with it being returned to the payee if initiatives are not delivered within a set timescale (3-5 year limit).

5D2 We want to use cumulative contribution zones to determine the infrastructure actions, costs and delivery mechanisms Total responses - 667		
Agree 79% (530)	Disagree 21% (137)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• The Council's current cumulative methodology has been recently rejected by the Scottish Government. Further work by the Council is therefore needed to demonstrate that its approach to contributions meets the various tests in the Government Circular, and going forward cumulative contribution zones should be influenced by the Chief Planner's letter. • Clarify how do non-allocated sites with planning permission proportionately pay and if refunds will be made if more development in a contribution zone comes forward. • Clarify it is the equal share of costs is between different developers picking up the whole cost, and not an equal split between the developer and the council. • Cumulative approach spreads the costs of mitigating the cumulative impacts across a wide area with no single development being responsible for the entire cost of a specific infrastructure improvement. This is in effect, a 'roof tax', and there will inevitably be some winners and losers in this approach. • The identification of infrastructure provides certainty, but the use of contribution zones

5D2 We want to use cumulative contribution zones to determine the infrastructure actions, costs and delivery mechanisms Total responses - 667		
Agree 79% (530)	Disagree 21% (137)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		is problematic, and cumulative zones are not supported. • Await details of a proposed infrastructure levy and therefore the idea of cumulative contribution zones that may seek a second 'tax' for potentially the same purpose threatens to make development unattractive and potentially unviable in Edinburgh. • Provided also the mechanism does not delay all contributing projects to the date that the last contribution is made.

5E We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Total responses - 665		
Agree 86% (575)	Disagree 24% (90)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
• Developer contributions can have significant implications for the viability and delivery of housing and should be within the LDP and not within Action Programmes or non-statutory guidance. This approach allows for consultation and independent scrutiny, which must be the case for such important matters. • In line with the new Planning Act.	• We need the confidence that this has been independently considered prior to adoption, and only applied following adoption. It will not be possible to set out the precise amounts until the content of the plan is approved (otherwise, updates to the Contributions will be required prior to adopting the Plan to reflect changed allocations which could have a bearing on the	• Infrastructure charging mechanisms also need to be agreed to reflect the scale of community infrastructure sought. • The proposed contribution zones and levels should be subject to consultation with the development industry and the methodology should be clear.

5E We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance.

Total responses - 665

Agree 86% (575)	Disagree 24% (90)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Support a clear, integrated approach. More efficient and cost effective when it provides higher developer/investor certainty and confidence and hopefully reduce the s.75 negotiation timescale. - To emphasise the importance of the policy and ensure compliance. - One easy-to-read document, for the benefit of communities and developers alike. Developer contribution expectations must be transparent, understood by communities, in the LDP, with site specific details. - Better for developers to deliver directly. - It must be clear from the start to the developer what their commitment is. Use of supplementary guidance can make it feel like it is not mandatory and can be forgotten or down-graded during the course of the development work - I am confident there are examples where this has happened, particularly with 'softer' items like green management, and with the scale and quality of built infrastructure which is actually delivered.	amounts identified in the plan). Therefore, the precise contributions should continue to be set out in Statutory Supplementary Guidance prepared following receipt of the Examination Reporters Report. - It is not in the interests of a plan led system to defer the inclusion of important policies which will impact on viability to non- statutory guidance with no formal process for adoption. - Only set out guidance for developer contributions within the City Plan 2030 and the associated Action Programme. Guidance for developer contributions should certainly not be set out in non-statutory guidance. - Potential issue with Action Programme also setting out costs and duplication/contradiction between the two documents. - We do not believe that the Action Programme should contain anything other than the Actions required to deliver the plan, and the contributions should be contained in one document. - Developer contribution amounts should be fixed at the level they are at when a planning application has been submitted, and not amended upwards thereafter.	- Engagement with relevant stakeholders, including landowners should take place as part of the Action Programme's preparation and subsequent revision. - Developer contributions should be set out in site briefs. - Supplementary guidance could still be useful if circumstances change during a plan period and existing guidance requires significant amendment. The cumulative impact of policies in the plan on viability should be assessed and policies should clearly outline where further guidance will be required and the scope of this guidance. - Suggestion that there will continue to be a reliance on the Action Programme and non-statutory guidance appears to contradict contribution guidance in the plan. - Resolve existing Supplementary Guidance with the Scottish Government first. - Provided the existing 2018 Supplementary Guidance on Heat Opportunities Mapping is retained which is helpful and identifies opportunity to source significant scale heat for heat networks at Seafield (existing RS-3 allocation of EW 1d for an Energy Recovery Facility). Moving this into the plan would be

5E We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Total responses - 665			
Agree 86% (575)	**Disagree 24% (90)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• This is a ten year plan and much can happen in that period and so you may need to issue supplementary guidance.	beneficial. It should not be done in a way that reduces its significance as a planning consideration in determining applications.

Choice 6 – Creating places that focus on people, not cars

| 6A We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes.

Total responses - 826 |

Agree 82% (679)	Disagree 18% (147)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Is in line with National Transport Strategy hierarchy with walking as primary mode undertaken and planned for. - Promotes the use of walking and cycling, least carbon intensive transport and contributes towards community health and fitness. - Tackles congestion.	- Not enough information on what targets will be derived form, justified and monitored. - Unclear how targets will be able to respond to changes in public transport timetables occurring during plan period. Resulting in undue prejudice by decisions outwith the control of the community/developer. - Use PAN 75 Planning for Transport Annex B Personal Accessibility Analysis for accessibility profiles for new development. - Development should not be hindered solely on accessibility grounds. - Would only work if public transport improvements are not just planned but already exist or are underway. - Won't deliver the certainty required for a planning system – relies on too broad a range of assumptions. New developments can subsidise early public transport services, which this approach won't take into account. - Policy would need to be flexible and allow for cross boundary commuting, or it discriminate those needing to travel further for work.	- Measure public transport usage of an area and target a percentage increase over plan lifetime. - Don't hold all applications to a single standard. Use a tiered approach to setting targets - city-wide, district and local) for specific types of development. - Could be assessed against ease of access to infrastructure and active travel networks. - Make it clear requirements not targets. - All new developments should have no net car traffic impact; consider zero onsite parking (and Controlled Parking Zone in the whole area) and/or car traffic reducing and public transport measures. - Not just private car use but other commercial vehicles that is causes congestion and air pollution. - Low Emission Zone central zone should be extended. - Take into account bus service frequency, directness and reliability. - Take account of residents and visitors with limited mobility, focus on accessibility for all.

6A We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Total responses - 826		
Agree 82% (679)	**Disagree 18% (147)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• Need full understanding of existing mode share and communities' travel patterns.	• If development is directed to where there is where there is sustainable travel options (Choice 5A), this proposed target should already be met. Seeks clarification at what stage in the planning process would these targets are relevant. • Confirm how targets be monitored and success measured and what happens if targets are not met. • Policies should put in place interventions required to deliver modal shift. • Follow the Sustainable Transport Hierarchy and Sustainable Investment Hierarchy as set out in the National Transport Strategy 2 especially when designing layout of new development. Further consultation on the detail is required prior to Proposed Plan publication. • Would require deregulation of bus services allowing a commitment to deliver services from operators. • Consider factors impacting on bus use e.g. Covid-19 and rerouting of services from the City Mobility Plan/ City Centre Transformation plans to reduce city centre through routes.

6A We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes.

Total responses - 826

Agree 82% (679)	Disagree 18% (147)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
		• More consideration of creating new routes not just assessment of what exists. • Can't force residents to use one mode. • Majority of households will still want to own a car for some trips. • More important to build at higher densities so there is less need to travel long distances. • Approach may disadvantage areas already deficient in sustainable transport routes. • Update existing policy. • Council policies are too biased towards cyclists. • Plan for car routes to reduce time and emissions.

6B We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport.

Total responses - 798

Agree 73% (580)	Disagree 27% (218)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Place briefs should include information on trips by walking, cycling and public transport as a key element of successful places.	• No robust data to support or implement this. Methodology and targets needs to be consulted	• If Place Briefs embed parking standards, they need to be available from the Plan's

6B We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Total responses - 798		
Agree 73% (580)	**Disagree 27% (218)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• If existing parking spaces are being reviewed, alternative uses for this space including mobility hubs, bike parking and retrofitting green / blue infrastructure should be considered as part of place-making and improving sense of place. • Consider grouping parking spaces away from individual front doors, enabling a better use of outdoor space. Only increase parking restrictions when public and active travel have been improved. • It is part of a suite of measures necessary to create the necessary shift from the use of the private car to the use of public transport as first choice for mobility into, out of and through the city. • Will give local communities and opportunity to have their voices heard.	on and agreed to have sufficient weight and status. • Can't support without knowing what the public transport would be. • SPP and other guidance already sets spatial targets for active travel, and parking standards are already in place. • Planning Advice Note 75 Planning for Transport Annex B Personal Accessibility Analysis provides the basis for identifying accessibility profiles for new development. • Use existing policy framework. • Wrong time to be making decisions and setting targets, pandemic will change work and travel patterns, office downsizing, reduced use of public transport. • Not the function of place briefs and too prescriptive. Should be in policy or statutory supplementary guidance; too for briefs, may not be deliverable outcomes without the engagement of landowners and informed by costly detailed site works. Limited status of Place Briefs. • Car may be only option for disabled residents. • Multiple trips rely on private cars e.g. working parents, tradespeople, shift workers	adoption, otherwise delays to housing delivery targets. • Targets should be in the plan, but place briefs can use them. • No reduction in bus stops/spacing. • As other parking is reduced, increase disabled parking and drop off points. • It is important also not to create another layer of hypothetical assessment that has to be undertaken, disputed and debated with every single planning application, to the benefit of nobody except planning consultants. • Rescind its Parking Action Plan • Explore car free streets. • Plant trees and cycle parking instead of car parking. • targets should only be set in relation to planned transit interventions where a financial and legal commitment is in place to deliver them • Place brief should demonstrate that the need to travel generally is reduced. • Master planning exercise to develop connectivity • Use pilot demonstrators to raise awareness of designing in low car use.

6B We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Total responses - 798		
Agree 73% (580)	**Disagree 27% (218)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• Desire to retain car ownership for trips away from main centres of population. • EV means car ownership may remain prevalent. Reduce car use to work or city centre but not ability to park at home. • Low levels of parking are a source of objection to planning applications. • Low parking levels may result in less marketable housing, or overspill parking causing conflict with users, and reduced amenity. • If planned public transport intervention does not materialise, some developments will be left without enough parking yet rely on car use. • Employment hubs are dispersed around the fringes of the city, people don't always live near work and public transport won't always link. • Only for strategic development sites. • Zero parking is a challenge to provide for varying needs. • Many variables which need to be considered when establishing appropriate parking levels, some of which will not be known at the Place Brief stage e.g. operational requirements. It is therefore not appropriate to set such targets at this stage.	• How will targets be monitored? • Avoid reverse incentive whereby people take cars to work to avoid daytime parking restrictions at their homes.

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking

Total responses - 798

Agree 69% (554)	Disagree 31% (244)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Consistent with other cities seeking to prioritise walkable urban environments. - Has to be in conjunction with transport interventions. - Transport interventions must be integrated with masterplanning new development - Less pollution will encourage pedestrians and cyclists. - Integrated approach between modes of transport. - As long as there is an understanding of why people are selecting a particular mode of transport. Are schools close to the catchment area? If a parent has to drop of children and then travel to work on the other side of town particularly if they are a single parent this can take much time out of their day. - Would generally support subject to appropriate targets being outlined for family housing where an element of car trips will still be required. - Wider measures to guide people towards public transport and walking/cycling is supported. The proposal at Bankhead can contribute to wider requirements which would include extension of park and ride facilities at Hermiston.	- Concern over methodology in determining suitable levels and how assessment of acceptability against targets will be made. - Results in parking in surrounding streets. Increase density/height rather than reduce parking. - Misuses planning policy to restrict car ownership. The rights of citizens to use cars (hopefully EVs) should be respected. - Dependent on new and improved public and active travel infrastructure. No guarantee public transport service can or will be provided in some areas. Needs to be backed up by commitment by (deregulated) operators. - Overly prescriptive. Minimum standards should be reviewed and allow for below the minimum where justified. - Aspirational targets not appropriate. Targets create false impression of success or failure. How will setting a target help? Car ownership does not necessarily equate to car usage. - Modal split is dictated by personal choice and cannot be targeted. People shouldn't be left with no choice but public and active transport if they don't want to or isn't convenient. - Continue with maximum parking standards in the Edinburgh Design Guidance of 2018, in accordance with Scottish Planning Policy.	- Planning Advice Note 75 Planning for Transport provides the benchmark for mode share targets (Annex C). - Car-free now common in highly accessible locations, dwelling types should be assessed against target occupiers, location, accessibility of the site by non-car modes to local amenities/ facilities and places of work, measures proposed by the development to minimise car usage, as well as the surrounding context. - Revision to make it clear that there will be no provision in any development for car parking other than for disabled, servicing and essential visitors. - Car free development only possible for brownfield developments, sceptical it can be employed in semi-rural locations. - Targets will need to be enforceable. - Only feasible with step change in public transport provision. - Resolve tension between policy aims and objectives with how developer see their markets. - Consider needs of displaced Small and Medium Enterprises lost to redevelopment.

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Total responses - 798

Agree 69% (554)	Disagree 31% (244)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
• Targets are pointless without providing improved facilities - segregated bike lanes and high quality (covered and secure) bike parking. • Consider requiring developers to consult with the Edinburgh Cycle Hire scheme regarding introducing a cycle hire dock at any large development. • This must be supported with secure bike storage for residents. • Too many cars on the roads. not enough room for public transport to operate effectively. • Good health benefits and all round being. More attractive for visitors. • Roads now need to be used for transport. No longer any room for parking on most of our roads, which now have to provide safe space for cyclists. There might be some Parking Hubs (or Transport Hubs) in the city: attractive multi-storey car parks from where the able-bodied could walk/catch a shuttle bus to offices, shops etc. "Car clubs" should be extended and could be based in multi-storey Hubs. These parking hubs could also be used for residents' parking. • Only if targets are set high enough to ensure there is a significant reduction in car parking throughout the city, not just the city centre.	• Overly complex and does not take account of operational or end user requirement. • National Transport Policy stresses adaptability and notes that whilst the desire is for modal shift that may not always be possible. • If evidence base is not available, could lead to inappropriate levels of parking allowed and overspill parking. • Parking constraints especially in suburban development are not effective in transferring demand from private car to public transport. • City Plan may disadvantage the substantial proportion of the population with mobility issues by limiting parking opportunities at such persons' homes and likely destinations. • Change of behaviours should be by improvement of public transport not by making driving by cars more difficult and punitive. • An absolute minimum level should be provided, especially in city centre development. The real issue, however, is the on-street parking controls. Edinburgh residents are becoming victims of the poor policy decisions of CEC, too many cars are driving as close as possible, parking in non-controlled zones. There should be a maximum stay (ranging between 2 to 4 hours) implemented	Careful balance to still allow some parking to service traders, businesses, retail. • Access to car club and other shared transport services also alleviates level of parking. • Consider underground parking. • Extend and enforce Controlled Parking Zones and permits. • Supported by a gradual removal of existing on-street parking to free up road spaces for public life and planting. • Travel plans to mitigate against car use. • Consideration for parking for social care visits. Continued reliance on retail centres predominantly accessed by car, so reducing parking will disadvantage some to access these facilities. • Current cycle parking standards are too onerous and create dead frontages at ground level or reduce usable outdoor amenity space. • Align cycle parking with BREEAM standards of 50% for student accommodation. • An independent study should be undertaken to inform the level of cycle parking associated with student accommodation and general housing.

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Total responses - 798

Agree 69% (554)	Disagree 31% (244)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• We have to drive a massive reduction in driving through policy setting, we can't wait for people to reduce their vehicle usage as that will not happen without policies pushing it. • Also factor in the demographic; good that student housing is built without car parking spaces. • The usage of cars should be reduced significantly, with access permitted to a limited number of authorised vehicles. • Reduced car use in Edinburgh is both achievable and would improve many quality of life aspects of living in Edinburgh - Amsterdam, Copenhagen and Basel are good examples in my experience. • The student flats that were supposed to be car free, but the students use the side streets to park their cars creating more congestion. Enforce Permit parking all our streets. • Good idea to plan for new developments by arranging suitable alternative transport and communications not requiring cars. On street parking at dwellings is not a particularly useful way to limit car use - which should be controlled by charges for use of cars, and destination parking charges. The cars in controlled zones may well sit outside houses unused. It is possible to build	to prevent people parking all day for work purposes. All this does is shift the local air pollution issues into residential sites, ironically, where higher numbers of local trips are conducted by walking, cycling, scooting. • This is discriminatory behaviour. • No parking causes frustration and pollution. • Making trip targets assumes you know who the ultimate user is going to be and fails when dealing with anything beyond what it was designed for. • Number of people no longer come into town because of the endless disruption due to roads being constantly dug up. This affects buses too. • This is flawed and ideological thinking. Setting targets and expecting behaviours to change has been tried and shown to fail. • You can consider a reduction in car usage perhaps, but not an all-out car-free development. There are many car users who are regular walkers and cyclists, cycling could well be there preferred method of getting to work and other places. • Those of us who live outside Edinburgh need to use cars to get into work.	• Use of lease agreements in PBSA are used to discourage car ownership. • Agree with controlling on-street parking in problem areas. • Significant reduction in car parking standards may have a number of negative consequences, including providing for varying needs. • Over emphasis on direct cycle trips fails to understand the varied travel patterns of all residents, 'trip chains' around tasks which necessitate bus or car use. • In Tokyo no on street parking is allowed. If you cannot park your car on your property then you are not allowed to have one. The difference between here and Tokyo is that the city has a joined up transport system - all buses every 5 minutes and tubes every 2 minutes. Until there is a massive improvement in the transport system then the idea of banning cars does not make sense and people will not buy properties under the present conditions. The transport has to be in place before properties are built not the other way around. • Does not work for those outside the city bypass, as the alternatives to car use are not there.

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking

Total responses - 798

Agree 69% (554)	Disagree 31% (244)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
houses which are aimed at those without cars, provided public transport is frequent. • But we need to ensure that public transport options are fit for purpose. We need rapid transit from outer suburbs and dormitory town to encourage use. Taking 1 hour plus to get into the city centre by bus is too long and encourages car use. We also need to widen the bypass to cope with traffic otherwise drivers will opt to use city streets instead. The car (fossil fuel or electric) is here to stay. Accept and plan accordingly. • Less sure, however, that the aspiration to 'car-free developments' is either realistic or desirable. Traffic congestion in, or closer to, the city centre is manifestly a problem but other policies (see 7B, 7C and 7D) would help address this. Conversely, it is not unreasonable for residents to want to use cars for longer journeys and/or journeys outwith Edinburgh which may not be achievable by public transport. The Plan should focus not only on parking levels but on provision of electric car charging points within new developments. • Reduce parking capacity in the city, and increase tax for car parking at work.	• Reduce permits for students. • The right to be able to drive when needed should be supported by parking. Traffic will only reduce voluntarily when enough other options are available. If not enough parking provided it will only exacerbate the current on street parking situation. • City of Edinburgh Council seems to force to abandon cars rather than promote environmentally friendly transport. When you make conditions for green travel to be attractive you won't have to police cars. • Parking places should be set by area inhabitants. Other measures mean more pay zones. • Create an acceptable alternative and people will use it. Stop treating cars as the problem and fix the public transport and make the City easier to get around which will reduce the amount of time trips take. • Outdated projects like the Tram are not a solution and if anything increase the congestion on the streets. • Lots of people need their cars, especially work vans, give us more park and ride sites to stop	

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking Total responses - 798		
Agree 69% (554)	**Disagree 31% (244)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Far too much space given over to parking. With COVID we need less space for parking and more space for active travel. Parking should be permit only. • Strictly controlled residents' parking only. Car numbers expand to fit available parking space. • Main streets should have segregated bike lanes first, then the second consideration should be bus stops, loading, and then finally on-street parking of cars. • We don't have a city in which a car per person is a viable, still less a pleasant, option. I don't think new developments should include any on-street parking. • Parking in high-density population areas, such as the city centre, should be reduced by 3-4% every year in tandem with an equivalent increase in public and active transport developments. Delivery vehicles should have delivery times rationalised to allow re-allocation of space. • Agreeing on the assumption that you are not taking away parking facilities for existing homeowners who have car parking. • The plan would however need to take into account the potential changes in demand in the future, and so allow for potential changes in parking requirements.	staff from companies parking in our streets and causing annoyance by the residents. • If there is not enough car park spaces they will just park on the road which will increase traffic which increases co2 emissions so this will do the opposite effect on our climate than what is intended. • If cars are electric then sufficient parking should be available. • Enough parking should be available to deal with Covid and pandemics. • People need choice. So it is possible to use a car for a large family grocery shop. • There is not enough parking at present and quite enough parking controls. It puts visitors off coming into the city. • Unrealistic given that we will be moving to electric vehicles in any event it has little or no impact. It's potentially very unhelpful. • Cars are still essential for families and working parents. • On-street parking is a scourge. Cars are vitally important to many people and most developments do not adequately provide for car owners. Simply removing the requirement for	

| 7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking

Total responses - 798		
Agree 69% (554)	**Disagree 31% (244)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• But again there is no point restricting car parking places and hoping that those people won't still drive everywhere. • This may be adversely affected by Covid-19. • Should go further. There should be extremely stringent controls on the provision of any parking for any new developments in the city and tightly controlled Parking Zones city wide. • Managing through price is and effect way of achieving targets. Make cars expensive to use and public transport affordable or better still free and watch the use of cars reduce. • Ensure adequate provision of vehicles for shared use. • There should be no resident parking provision in the city centre and inner suburbs other than for disabled parking. • Amsterdam recently removed 18,000 spaces, while Paris achieved similar. We should look to do the same. • Need to make sure the cycle provisions/safe roads for cycling are in place before you can expect a large proportion to go car-free.	car parking spaces from the developers will place a burden on others. • Targets are very hard to set and to achieve. • If taxis are still allowed and car parking is not available, we will be over run by taxis. • Parking provision assumes that cars enter the city centre. Would prefer that measures are taken to deter them from entering in the first place e.g. a congestion charge or even bans from specific areas. • Needs flexibility needed to respond to changing conditions. • Detest your policy so far of encouraging behavioural change by simply punishing the motorist and trying to beat them into submission. Removing parking spaces won't help. This will just increase congestion as people go looking for a space, increase road rage incidents, make my working day much harder and have an overall negative affect on mental health and the experience of residents. • Prefer a policy of education and pro-healthy transport choices propaganda. Investment in improving public transport routes, i.e. better	

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking Total responses - 798		
Agree 69% (554)	**Disagree 31% (244)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- We could focus on more access through the use of trams/tube option. So areas need to be allowed to develop more alternative options. - Introducing city wide controlled parking will force an increase in either parking charges which can in return be used to spend on transport infrastructure or a direct reduction in car usage. - Parking levels should be set on the basis of spaces required by people who need to use cars (blue badge, service providers) and delivery and maintenance staff. - Edinburgh Council has just approved an additional 1200 parking spaces in the city centre, working against this strategy. - Residents must start to pay market price for parking within the city. - Development should reduce car ownership, reduce the spaces required and for those who require it a clause could be electric vehicle only with EV charging points provided. - Should provide better public transport hub and spoke provision. - Set parking to an absolute minimum and instead promoted the car club provision in the city. Need to look at decreasing parking provision in existing	- signpost and identify the dedicated cycle lanes that cover the city. - A scheme to subsidise bus passes or bike ownership for office workers (i.e. not one punishing policy for all, but target those who realistically could increase use of public transport, with positive policies). - We need to ensure people can get to their houses for moving and food deliveries. - Encourage developments in the city to walk or cycle but in outlying villages this is not always possible. Still need to provide adequate parking for residents and visitors so that housing estates don't look full of badly parked cars. This restricts children playing and ruins the aesthetics of the area. - Mobility plan will increase people's desire to own and use a car, not reduce it - because the changed public transport system will be so unusable they will make more trips by car. - You will only create congestion elsewhere. Cars are here to stay and with the recent announcement around no petrol or diesel cars by 2035, this is a short sighted view.	

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking		
Total responses - 798		
Agree 69% (554)	**Disagree 31% (244)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
developments and in streets. Cut down parking in city centres and out of town shopping centres too. • Targets should be city wide. • We can't get rid of cars in 10 years, like to see adequate parking (underground?) in new developments, so there is no overspill of parking onto surrounding roads. • Need to revisit congestion charging with park and ride at all bypass junctions. Company car spaces should attract a charge. • Current parking restrictions must be enforced by traffic wardens and police officers otherwise people will continue to infringe upon the rules. It is good to have a target, but it must be enforced. • Needs practical solutions for vehicles associated with maintenance and deliveries. • Inequality, as older developments will have different standards. • Need active management of "ad-hoc park and ride" (i.e. commuters parking in suburban developments and completing their journey to the city centre / hospitals by public transport). • Should seek to reduce parking not just "control" it.	• Unrealistic to expect residents in particular to give up using their cars. • Traffic congestion in Kirkliston is really bad at peak times, which is mainly caused by traffic trying to get to and from Fife. Consequently bus journeys are delayed or cancelled. People lose faith in the bus services and revert to the car thereby making the problem worse. I've seen nothing in the City Plan that addresses the peak time congestion problem. • Where is the plan for more environment car use, electric and hydrogen vehicles have a part to play. • Targets must not be set too high. Traffic in the city centre must be reduced and more areas pedestrianised. • Arbitrary targets forced upon people does not work without appropriate communication and support. • Impact of Covid-19, can't get rid of cars. • Building houses with no or little on street parking or driveway parking for only 1 car has caused many issues. Made even worse when people had visitors as there was nowhere for them to park.	

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking

Total responses - 798

Agree 69% (554)	Disagree 31% (244)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Consider introducing on street parking for parents with kids in car seats that are unable the get out by them self. - The whole city needs to be an active travel zone - with wider pavements and protected cycle routes. - There needs to be incentives to get people to use public transport or to use more shared transport like car pools. But invest in delivering across all commuter links. i.e. don't penalise the poor for trying to access resources.	- As much as it is a great idea to have 'car-free' living it is just not realistic. - Deters a quick visit to local businesses which is detrimental. - Targets should differ between the working day, working week and other times. - On street parking should only be in city centre. - Encouragement rather than targets, e.g. require showers and drying facilities at work places. - Need accessible public transport first e.g. that meets the needs of those with disabilities. - Needs to be a better balance between practicality and green approaches. - Scotland does not have the climate to encourage most people to walk or cycle to work. - Include new tech options like e scooters and segways. - Existing communities are not all served by sufficient public transport. - Planning based on targets cannot work until behaviour change among the population has been shown to be in line with those targets. - This will affect the poor more, where they are forced to live in high density development.	

7A - We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking

Total responses - 798

Agree 69% (554)	Disagree 31% (244)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	Residents parking fees too high already and unfair.	

7B We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme.

Total responses - 783

Agree 74% (581)	Disagree 26% (202)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Key disincentive to car use. - Supports the creation of healthy inclusive public centre. - Requires infrastructure e.g. public lifts to cater for all mobilities and ability to walk longer distances. - Control of city centre parking is required to deliver City Centre Transformation. - City centre parking reduces land available for housing. - Provides space for planning for climate resilience (space for people, water and wildlife). - Ensure Tra 5 City Centre Public Parking is updated. - Support the introduction of a parking levy on employers and retailers in the City Centre to	- Only more car parking at a reasonable price will slow the death of the city centre. - We are of the view that restricting city centre car parking simply pushes this out to surrounding areas, with consequential adverse impacts. - Restricts potential investors in Edinburgh - Cost of parking is enough to make it prohibitively expensive to use car, with impact on deterring families from the city centre. - Reducing parking and narrowing streets causes more congestion. - Decide on case by case basis on merit. - Creates parking congestion in commuter areas. - Consider short to medium term behavioural impact of Covid-19 on bus patronage vs private car use.	- No parking provision other than for disabled, servicing and essential visitors. This must be done in tandem with phasing out on-street parking. - Manage commercial needs – deliveries etc. - Cut down on business travel to the city centre by remote working and meetings. - Provided that social care staff can visit city centre residents. - Must not negatively impact on liveability for city centre residents. - Coordinate strategies to avoid displacing parking elsewhere. - City centre bus services from semi-rural communities will need to be extended, and

7B We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Total responses - 783		
Agree 74% (581)	**Disagree 26% (202)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
fund improvements in the public transport provision. • The city spaces should be encouraged to develop existing car use space into more socially positive uses. • Car free is cleaner, quieter and much more healthy. Important to tackle climate change. • Remove current car parking also. We should go further and have targets for reducing car parking across the city. • Consider a small incremental decrease in parking in city centre annually as the Copenhagen approach. • Cars should be banned from city centre. • We need a mindset change, that will happen only if people are given the opportunity to do something different. An example is after a tube strike in London, trips between certain stations remained down by nearly 20% as people realised it was faster to walk that take the tube between certain places. These were experienced commuters, but we just do what we have always done - make us do something different and see. • Car parking is the main factor slowing down transition to public transport / cycling. If ample	• The centre of Edinburgh will die if there are no cars. Cars need to park somewhere. • Punitive policies against car use within the city centre simply deters multi use of the city centre and will continue to push shoppers and diners/leisure pursuers to use out of town facilities. • Cars are often the only option for families or those with disabilities to access the city, both in terms of convenience and cost. People will vote with there feet and shun the city in favour of other locations if it is not possible to park. • Car parking should be available to those that need it (disabled parking, taxi ranks, goods vehicles, etc.), so additional parking may be needed. There should be measures to prevent or reduce private vehicles using such space, however. For example, only cars part of a carpooling program might be allowed in the newer (and some existing) car parks. • How do people carry large items bought in the city home on a bus/ tram? • Don't just protect against additional car parking, but work to reduce existing parking. • New builds could provide underground parking. • Agree that we should be reducing on-street parking and encouraging development without	long distance safe cycle routes into the city centre. • Consider mobility hubs replacing parking see Bremen example with target of removing 6,000 cars from the city. • Clarify that this is 'additional car parking' compared to existing provision. • This should go further than protecting against additional car parking but rather look to reduce the number of available spaces in the city centre, and extremely high car park fees across all operators, not just those subject to workplace parking levy (e.g. discounted multi- storey car parks being used as office car parks). • Important to tax office car spaces, institute road pricing schemes and more efficient public transport to provide alternatives to cars. But the same limits need to be applied to peripheral developments (Gogar, Fort Kinnaird etc) in order that economic activity in the city itself is not diminished unnecessarily. • Plan for more use of shared private vehicles, that won't need to be left until the owner returns, but will be available for re-use (or

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parking space driving is too convenient, and cycling too inconvenient / dangerous. • Enhances the quality of life of residents and visitors • The only parking in the city centre should be for blue badge holders. • Provided that it is supported by a robust public transport system that will enable non city dwellers to get around with ease.	cars. Pricing can control parking but it will not eliminate it in the near future. • Pedestrianise, be bike friendly, etc, but I think there should be car parking allocation at strategic points to the city centre that allows a 'park and walk' philosophy. And car parks don't need to be ugly, there are numerous examples in Germany where they are attractive infrastructure items. • Need to think of temporary parking for deliveries and tradespeople. Tools cannot be transported on public transport, by bike or on foot. Car free city centre not ideal. • Data should be collected to determine the usage of car parking in the city and when this reduces, then the planning requirements should be relaxed. • If taxis are still allowed and car parking is not available, we will be overrun by taxis! Taxis will be parking on double yellows and sitting waiting for people whilst running their engines. • Best way to encourage people to take the bus is to make it more cost effective. • Might deter companies occupying developments • People need to get to work 24/7 and the transport infrastructure would not meet future needs. • Provide a credible alternative first.	hopefully, will drive themselves away again). • Support subject to protecting car parking for residents. This might be better achieved by the development of a smaller number of designated high density car parks and freeing up on-street space for active travel. • On-street carparking will need to be largely removed in the city centre (e.g. George St.) to allow for physical distancing. • Agree with the exception of the development of new charging hubs for electric vehicles, which are important not just for residents, but for taxis and vans that work in the city. If the Council follow's Dundee, Falkirk and East Ayrshire's lead and develops these charging hubs themselves, then the revenue from them can be reinvested in vital public services and the expansion of infrastructure for safe and enjoyable active travel. • Protections need to be in place to ensure immediate surrounding areas to the city centre do not suffer from overflow. • The plan needs to rethink what type of businesses are in the city centre. If people are doing significant shopping in town they need a means by which to bring their

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Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• Why is this necessary when we will be moving away from petrol/diesel vehicles to electric or hydrogen? • Provision of more short-term parking for delivery purposes should be a planning priority to maintain residential amenity in the city centre and reduce the need for individual travel. • Purposely making it difficult to find parking will force drivers to park in places they shouldn't or spend longer driving around looking for a space, meaning higher emissions from the cars. • Post Covid many people will not be able to use public transport, so parking needs will change.	purchases home. If the city centre is designed for entertainment and social purposes and perhaps services then this need diminishes. • Tax workplace parking heavily. • A well developed efficient public transport system should make cars largely unnecessary and unwelcome in the centre. • Japan operates a 'proof-of-parking' model, which requires car owners to prove they can park their vehicle off the street by obtaining a certificate from the local government. We should follow this model. • Sufficient city centre parking at the moment. Just don't reduce it. • Castle Terrace carpark should be unlisted and demolished.

7C We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Total responses - 796		
Agree 82% (650)	**Disagree 18% (146)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Allocating more space to people and plants and less to cars, like widening pavements and planting street trees, "pocket parks" will have a significant benefit. • Reduction in parking spaces, resident and metered, would be a disincentive for car use. • Studies on public transit (busways) in Cambridgeshire have shown that the reduction in car parking spaces can be a powerful incentive for people to change to public transport or active travel. • Copenhagen has demonstrated that restricting free and easily accessed car parking is a necessary element of a strategy to increase active travel and reduce private car use within cities. • Concerned at the reduction in parking spaces when so many older people are not able to travel by public transport into town and cannot walk or cycle. • Must be conscious of congestion, not just air quality. Great, provide for Electric Vehicles but it feels short-term in consideration. There must be an underlying desire to reduce congestion, not just air quality.	• Change to EV will happen inevitably but until then shouldn't penalise non Electric vehicle cars which are still unaffordable for most people. • Not a progressive tax as until widespread tram route throughout the city, people will require to park cars. • More clarification on management of Electric Vehicle infrastructure. • Cycle parking not used. • Policy should respond to accommodating demand, rather than controlling it. • Users of electric vehicles should not getting free electricity. • Discrimination. Not everyone can afford Electric Vehicles. • No parking charges for those with disabilities or Electric Vehicles. • What about residents in the city centre - there is a shortage of available parking as it is just now. any more restrictions are unworkable. • Not everyone falls into your limited categories and some people need cars. • Many people will not have the resources to change their car to electric while their current car is not old. Discarding perfectly working cars is not good for the environment.	• Council could work with developers to offer mobility management: charge a developer for each car park that is built, or allow them to use this 'allowance' to be put into providing public transport, car clubs, cycling infrastructure, etc. • Promote car club as an alternative. • Additional infrastructure needs to be sensitive to the historic environment. • Better bike storage solutions as bike theft is an issue: explore secure cycle parking in back greens. • Include on-street visitor cycle parking requirement. • Electric vehicles: • Any developments should make provision for both current (active) and future (projected) demand for electric vehicle charging infrastructure either on-site or as a contribution to a public charging infrastructure, co-ordinated by the Council in a similar way as it does with contributions towards the City Car Club. • Ensure sufficient capacity within the electricity grid and sub-stations to accommodate demand.

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Total responses - 796

Agree 82% (650)	Disagree 18% (146)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- High quality secure, covered bike parking should be installed to replace car parking. - How is demand going to be controlled? - Need to increase the charging infrastructure soon. - Greatest priority for disabled and electric vehicles. - In conjunction with safe routes for cycling including access from the outskirts into Edinburgh. - Parking for all types of cycles like adapted bikes and cargo bikes are needed. - Car club electric vehicles should be prioritised. - Parking for bikes is great and should be supported. However, rates of bike theft in Edinburgh are a real deterrent for locking up your bike. The council should consider how to create bike parking which is difficult for bike thieves to target. - It should be made clear that 'electric vehicles' include cycles. - Should be proportionate to demand. - The council could consider providing free electric vehicles offering open-access for	- There are significant issues with electric cars at the moment – cost, range and battery disposal being just a few. Policies should not be geared too heavily towards electric cars. It also favours the wealthy who can afford electric cars. If people are coming from rural areas it is sometimes not convenient to use park and rides and they live too far away to cycle or to use an electric car as well. - Nothing that uses battery power is environmentally friendly. - Electric will quickly become the norm and therefore shouldn't be used as a means to control parking and reduce cars in the city. Short term impact at best. - Support all types of parking. This sounds like removing parking whilst pretending you are doing so for "justifiable reasons" such as disabled, bikes etc. - Mass cycling is not going to happen here, the urban sprawl and weather act against it. Electric car charging in town is not practical and a better solution is needed for that.	- EV in all public parking areas and provide charging stations for electric wheelchairs and mobility scooters, as well as 4 wheeled vehicles. - Must reduce congestion as well as air pollution so Electric Vehicle not the solution, reduce all car dependency. - There must be flexibility within any parking policy to examine the specific nature of the business needs of a proposal, and not just that it falls within i.e. Business and Industrial. - Ensure adequate off-street parking and garages that is fit for purpose. - EV cars are not the solution to achieving carbon neutral status by 2030. - Clear guidance on the requirements and the future liability of EV charging, with Edinburgh Council managing all EV charging points. - Does control demand mean reduce demand? - Preferential tariff for electric cars is a regressive tax solution. When they are cheaper they will replace cars and be back where we started controlling private vehicles.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- people with disabilities which would follow the main roads in the centre. - Ensure electric cars pay a realistic sum, not just free parking. - Don't think it's possible to provide enough charging points for all the electric cars that are supposedly going to be the future. - E parking must quickly be profit generating. - All parking should be charged. Charging money for parking is by far the best mechanism to control demand for city parking and car use. Charges should be high and only people with a disability should be allowed free parking. Electric vehicles no longer require free parking because public up-take is now high. Why encourage more cars? - Incentives are the way to go to convince people to change habits, the carrot is way better than the stick that you are suggesting of limiting spaces. Provision should be made for electric cars to use bus lanes and preferential parking with chargers. - Be aware of encouraging journeys being made by car so that the car can be re-charged.	- Wary of inflexibility, how suited are Edinburgh's hilly and narrow streets for cycling, especially of an ageing population. - Bikes can be left in a number of places, cars require parking spaces. - Better provision should also be made for secure motorcycle parking, as they pollute less and ease congestion. - If there are to be significant restrictions in car use in the city centre why do we need electric charging points there? - Its pandering to the minority we need electric vehicles that are affordable to more people to start with. - Parking should be available to charging and non charging cars as it many people have hybrids and it will be a number of years before cars are all non-fuel. - There is a considerable amount of essential travel not covered by the above statement. - More parent/family parking is needed and the bays need to be longer and wider to prevent damage to property. - Cannot see how a change in policy will reduce demand.	- Electric cars are less environmentally damaging but not without a carbon footprint, and not the solution to achieving carbon neutral status by 2030. - Current policies are resulting in storage being provided for excessive numbers of bikes in new student accommodation, the occasional disabled vehicle with no space whatsoever for maintenance vehicles or picking up and dropping off points. - Edinburgh is a hilly, wet, windy city with numerous potholes to discourage cyclists and damage vehicles. Doubt whether it would be possible to install enough electric charging points in the short term (10 years) or to build the power stations needed to energise them. Following the Coronavirus (Covid-19) outbreak, some things will get delayed or become commercially uneconomic. We may yet see hydrogen powered vehicles becoming the preferred option so electric charging provision should not be over-hyped. - Bicycles are poor for transporting bulky goods home or transporting people home

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• This and many of the other policies in this and other sections will require real political will against people who cannot see the need for things to be different from the way they are. • Policies must also include adequately policed parking in bus and cycle lanes. • However, care must be taken to prevent a proliferation of parking by electric cars occupied by affluent people who can afford to in effect buy a parking space. • Suggest you consider adding CCTV to bike parking areas and electric charging for eBikes as well as cars. • Bike parking is far denser than private vehicle parking - no excuse for not achieving this goal. Many people with disabilities can still cycle adapted bicycles and provision for these should be prioritised within the cycle network as well. • There are not enough disabled parking spaces in the city and there are places that disabled people cannot access because of this. • But you will not get a modal shift to bikes and e-bikes without fit-for-purpose cycle infrastructure.	• Putting in charging facilities for electric cars in the inner city seems counter productive. Pollution will disappear but congestion will remain. In more outlying centres this proposal would be fine. • There is a lot of disability parking and bike parking without further increases. • Motorists wishing to access the centre of Edinburgh will only use public transport if it is direct and speedy. If they cannot park in the centre they will park in commuter areas causing even more congestion. • Bikes should be charged for parking but provide safe places to do so. • Not until legislation is passed to ensure these forms of transport are safely used both for the riders but also for the general public. • Cyclists are a small minority of traffic. Less than 0.05% yet you are bending over backwards for them . Make travel routes easier for cars to get in and out of the city. Whilst thinking about how to keep cyclists off the roads and pavements. • More incentives, make public transport cheaper to encourage use.	after a night out. Access to town centres should primarily be via public transport. By all means add charging points for electric cars but that means you must allow electric cars access to the city. Do you know how many electric cars will be in and around Edinburgh by 2030? • Again businesses are struggling and it is vital to make it easy for everyone to visit, conveniently and at an affordable cost. Often walking /cycling are completely impractical for people traveling into the city and public transport is both costly and infrequent. • Parking charges could be levied on bike users as they do not pay road tax. • This proposal is too wide ranging and could be used for social engineering and lead to the development of new "elites" with many of the citizens of Edinburgh being barred from using certain forms of transport simply because of their financial situation.

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Total responses - 796

Agree 82% (650)	Disagree 18% (146)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Better make sure that this is matched by electric vehicle ownership. - Should be mobility scooter parking too. - Should limit size of cars too. - Appropriate charging infrastructure needed particularly for multiple occupancy buildings. - Provide or subsidise bicycle storage facilities in and around high-density housing and tenement buildings. - Provided it does not reduce existing parking for new developments. - The problem of bicycles being parked where they shouldn't be simple does not seem to be related to the lack of provision of parking for them. - Ensure all City Car bays are much more clearly marked as most are invisible on wet winter nights and place them separately from metered parking to avoid confusion. - At present existing cycle parking levels can be excessive - can lead to lack of active frontages in new blocks. - In reality, if Edinburgh is to become truly green and carbon neutral etc., then every parking bay should allow for electric and / or petrol / diesel	- Bikes end up getting stolen and slow up the roads. - Cycling is a non-starter for the majority in Edinburgh. - Those with young children, or who travel across multiple sites in the city for work, are not included in these plans. - Car parking is already an issue. The Council need to be more creative thinking about underground parking. The use of both Charlotte and St Andrew Square areas underground would help rather than building multi-storey car parking. - Nothing wrong with this BUT it wouldn't be such an issue if we had introduced Congestion Charging. - For electric vehicles you would need to provide a safe fully lockable container, as they are a target for theft due to lithium batteries being valuable. These would need to be large enough to contain a mobility scooter, - New student housing often has loads of unused bike parking and often no spaces for cars to even offload. - Too many bikes on the road.	

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Agree 82% (650)	**Disagree 18% (146)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
vehicle parking. It should not be restrictive. Only this way will you enable all commuters and visitors to enjoy the experience of being in Edinburgh. • Converting fuel pumps to hydrogen is a more realistic solution to support green energy. • But not at the cost of penalising drivers who already pay tax etc • The definition of disabilities needs much wider scope than the current blue badge criteria - it needs to include all those who cannot walk more than 1/2 a mile, and all those currently 'sheltering' from Covid-19. • Reasonable charges that ensure people use the paid parking facilities is needed. • Implementing fees not impacting negatively on local residents, losing parking spaces during the day or forcing them to also pay high fees for parking permits for the area they live in would not be right.	• Charging doesn't deter, and it doesn't change behaviour. It just kills the city centre, which is stifled by lack of parking as it is. Don't increase the amount of parking - let those who can afford it or who need to park have the facility. But change behaviour by improving public transport and giving it priority everywhere.	

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Total responses - 788

Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Use of Park and Ride should be encouraged and the provision of more sites close to other transport modes which are easily accessible to the city centre will reduce traffic and carbon emissions throughout the city. - Support for Park and Ride facilities at Hermiston Gait to relieve Lanark Road West congestion; Gilmerton, Lasswade Road and Straiton with the potential to reduce volumes of traffic on three arterial Roads. - The allocation of new housing development should support the provision of park and ride facilities along the transit-based ESSTS corridors. - Essential to minimise the effect of the large volumes of commuter traffic from outside the city. - New developments should prioritise access to the Park and Ride, rather than the city centre. - Park and Ride are an essential bridge between rural and urban travellers. Rural travellers cannot always be expected to travel by public transport but that should be the case at the city boundary.	- Lack of ambition, 10 sites with a capacity of 10,000 would be a good target for today's volume plus growth. Mass commuting underpins flexible workforce. Challenge for transport will be space, not air quality as technological advances continue. - Safeguarding is a constraint on flexibility. - Gilmerton proposed site is permitted for mixed use development, do not support formal park and ride. - Could encourage driving, increase demand for parking and contribute little to carbon reduction. - May ultimately encourage car ownership in the landward areas. - The current usage of Park and Ride is impacted by congestion that builds up in the lead up to these sites. The suggestions presented are still within the extent of congestion, reducing the effectiveness to reduce congestion. - As lock-down has clearly demonstrated, technology now allows for seamless home working, and policies should support this, not over-provision of park and ride facilities, as these still take up land very unproductively, and are basically unpleasant tarmac slabs sterilising land	OTHER SUGGESTED SITES: - Additional parking capacity at Ingliston is urgently needed to avoid he current problems which can also result in overspill parking in and around the tram corridor. Likely to need further enhanced connections to the A8. - Consideration should therefore be given to safeguarding provision for a park and ride / interchange facilities at: Newbridge / Broxburn; the A90 at Craigiehall; Leith at end of tram route; on the A70 along with radical rethinking of bypass provision for the Water of Leith traffic corridor; Craigiehall makes provision for a 500-600 space Park and Ride facility to intercept traffic entering the city centre via the A90; and West Edinburgh associated with transit corridor (extended tram line shown on Map 11). This may assist those approaching Edinburgh from the M8, M9, Broxburn / Uphall and Winchburgh. - Better facilities in the NE of the city, support for Newcraighall extension, and run bus services to north, not just city centre. Or small scale Musselburgh with buses to Leith.

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- Provision should be extended to include most key road corridors into the City (e.g. South Queensferry to serve A90, Newbridge to serve M8, Hillend/Fairmilehead to serve A702), City Bypass Lothianburn Junction and extension of the Ingliston site. - Reduces pollution and congestion - In favour of anything that discourages car use. This is providing an incentive rather than imposing. - Park and Ride is still the main way to reduce commuter traffic entering the city. It is a very important facet to our climate plan in the absence of much better and further reaching public transport network. - Needed to prevent drivers parking on residential streets in town. Ideally a pollution charge to enter Edinburgh which encourages park and ride use.	- that could be put to much better environmental uses (specifically food production or afforestation). - Support if not on green space land. For example, create underground car parks and landscape the area. - Park and Ride sites should all be on the city boundary, not inside it. - Otherwise outlying centres within the city boundary are disadvantaged by poor public transport. - Please commit to public transport for all within city boundary. - That surely encourages car drivers more. Support train expansion. Open suburban rail lines again and use the space wisely. Stop concreting everywhere to squeeze traffic. Contradicts the wish to make use of land. And at present they generate no revenue. - bus times are too long, once you are in your car this is the fastest mode of transport, unless you can start to add train routes and keep the cost down - There are sufficient Park and Ride spaces in and around Edinburgh just improve the bus service.	- Edinburgh Orbital Bus Route (strategic cross-boundary commitment in SESPlan) could link to existing and proposed Park and Ride sites. - Additional Park and Ride for traffic from Queensferry and beyond, a suitable location would be Burnshot in the A90 corridor. - The absence of Park and Ride facilities at Hermiston Gait / Edinburgh for M8 / A720 traffic is a significant gap. - The absence of a tram connection at the Hermiston Park and Ride significantly reduces its usefulness to West Lothian (and CEC) residents. This would greatly reduce the need for car use and create a tram link between HWU and the airport. - Car parks at Ocean Terminal have for the past c 20 years been operating in similar ways, offering free parking to substantial numbers of commuters every day. The introduction of the new Tram extension to Newhaven will create a new interchange and likely draw further demand. Potential for Park and Ride facility in the area to connect active travel, tram, shopping and commuter interchanges.

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

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Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	• People do not want bus journeys of 45-60 minutes. They want a better public transport system of trams and trains which are quicker. • Need to identify Park and Ride sites for both the A90 & A702. • Park and Ride shows bad planning and allowing housing to explode before better options are offered. People don't want to have to take 10 extra steps to commute. More work from home and less Park and Rides, • Have you identified why the Park and Ride schemes aren't busier? What's stopping more people using them. Identify this requirement and then take the next steps to solve these problems. • "Safeguarding" is not qualified. Just because a site can be used for Park and Ride, doesn't mean there's not a use which would generate equal or higher amounts of social good. • It would also help if these proposed sites were manned to make them safer for users. • Studies have shown that Park and Ride schemes in the UK can actually increase traffic and have a negative impact on the environment. • Current Park and Ride facilities are too far from the city centre and it takes too long to reach it. They should be located near the rail links, such as	• Support a new Park and Ride within the old quarry at Dalmahoy Hill for traffic coming mainly from West Lothian (but also from Balerno) with one at a nearby location off Long Dalmahoy Road to access the Edinburgh/Glasgow trains. • Strong argument to have Park and Ride facilities on the outskirts of places like Livingston so that instead of clogging up the A71, their residents could catch a bus instead. However, only a limited amount of City traffic will end up in Park and Ride sites as the workforce is scattered across the City and does not reside solely in industrial estates or big offices. • Park and Ride at Musselburgh railway station and that station should become a parkway station for the ECML and east Lothian / Midlothian. • Kirkliston and Winchburgh should have a railway station with Park and Ride with the Almond cord built as well so easy access into Edinburgh. • Balerno could have a rail station on the Shotts line with car parking and there should be a train station again at Joppa and at

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan. Total responses - 788		
Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	Edinburgh Park, Edinburgh Gateway, where reaching city centre on the train will not take more than 10 minutes.	Tynecastle (Hearts FC) so people can use the train to get to the football and the rugby at Murrayfield via the Shotts line or a cross rail train. • Fairmilehead should be considered as a strategic site for a new Park and Ride. • Place the sites OUTSIDE the A720! • Strategic Transport Review 2 Case for Change discusses the importance of sustainable travel provision / options for visitors. This should be a key issue for Edinburgh, particularly if the potential for attractions to be more distributed throughout the city is delivered. A networked system of Choose and Ride sites could be integral to achieving this. (see Transport Planning Objectives in table 10) and ensure these inform the Proposed Plan. • Wait to develop these until clear picture of travel patterns post Covid-19. • Some areas of the city (not in Controlled Parking Zone) are already be facto Park and Ride. • Take into account feasibility study into the provision of Park and Ride facilities in north

| 7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Total responses - 788		
Agree 89% (703)	**Disagree 11% (85)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
		Midlothian. The proposed safeguarding of sites at Gilmerton Road and Lasswade Road may have some merit. The success of a Park and Ride site is related to predicted passenger demand and desirability of location, sites too close together are less attractive. Consideration of the impact on existing facilities in neighbouring Council areas.

• Re-schedule the timetable for new Park and Ride hubs in order to fit with the timescale for the Low Emission Zone and other initiatives.

• Function and design of park and ride sites:

The existing Park and Ride sites are single function only and have no real sense of place or integration. Develop through a design led approach a concept for how sites can be developed: arrive and choose a range of modes (mobility hub), with integration of green infrastructure. Potential also as peripheral mixed-use hubs and the |

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan. Total responses - 788		
Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		implementing proposed retail park regeneration. • Upgrade over time to provide slow charging facilities at each space. • Ensure surrounding rural landscape character is not compromised, include more screening tree/shrub planting and their maintenance. • Public transport from Park and Ride sites should serve more destinations, not just direct to city centre. Public transport operators must be consulted with in order to determine whether servicing new Park and Ride sites is feasible and/or preferred over expanding existing Park and Ride sites. • The Edinburgh Waverley Western Approaches study now under way create an opportunity for a mainline station at Kirkliston or Winchburgh. • As Park and Ride sites catering for mode shift of commuters and visitors from mostly out with Edinburgh, this needs to be coordinated in line with the Regional Transport Strategy, and build on the findings from the SEStran Regional Park and Ride strategic study.

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Total responses - 788

Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• With exception of Sheriffhall, all are oversubscribed.
		• Recommend that parking provision should allow for Camper Vans as I think the impact of the Coronavirus (Covid-19) and Brexit could see more people having home holidays. (Camper Van sites could be planned to be in close proximity with Park and Ride sites.)
		• This again strengthens the use of public transport. However the system must be accessible and convenient and easy to use Oyster card type system.
		• Anyone using Park and Ride can get the bus in and out of town for free.
		• There are also train and tram possibilities to consider.
		• As long as greenbelt land isn't used
		• Park and Rides must be linked by safe and segregated active travel infrastructure.
		• Not all people arriving at Park and Rides are heading into the city centre. There should be good provision for transport links in the outer parts of the city.

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan. Total responses - 788		
Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		• Not clear why requirement at Lasswade Road, so close to Gilmerton, Straiton and Shawfair • It would be helped by having much faster connecting bus routes with dedicated limited-stop buses and REAL priority bus lanes with zero parking in them. Park and Ride buses in Edinburgh at present are incredibly slow across the city due to congestion and buses having to share roadspace with general traffic. • But don't make them too attractive! Ideally there would be alternative public transport options for all legs of the journey • Should have a variety of travel options with travel hubs for public transport, bike share or electric car share options at them. • We also need to ensure the infrastructure is in place for remote working and that working spaces / places are also located at the perimeter of the city. • Why is there no park and ride provision within or near the Edinburgh infirmary planned? • Priority should be given to turning existing park and ride sites into multi-storeys where

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Total responses - 788

Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		possible, provided that they do not provide excessive visual impact; this could be lessened with clever architecture. Solar canopies and external walls could supplement the energy demand of electric vehicle charge points at Park and Rides, which will also have to be fitted with rapid chargers for taxis, vans and passers-by unless suitable charging hub locations can be identified elsewhere in the city. • All day visitors / tourists should be highly encouraged to make use of Park and Ride and the fantastic bus service. • The Straiton Park and Ride should be reviewed to ensure that busses can effortlessly get past the bypass traffic at peak times. Delays can be extreme resulting in decreased demand for Park and Ride. • Absolutely sensible, but there is no point in expecting people to use Park and Ride facilities if there is no disincentive to driving past them and on into the city, as in so many parts of Edinburgh. • Ingliston Park and Ride is used by West Lothian commuters and as an overflow carpark for the RBS at Gogarburn. Local

7D We want to support the city's Park and Ride infrastructure by safeguarding sites for new Park and Ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Total responses - 788

Agree 89% (703)	Disagree 11% (85)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		residents have trouble parking there during the day to use the tram.

Choice 8 – Delivering new walking and cycling routes

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Total responses - 808		
Agree 92% (740)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Sustainable alternatives supports modal shift from the private car, and reduces impact on key, congested routes, and safeguards the health of citizens and visitors and achieve carbon neutrality. - Active Travel is about improving quality of life and quality of place. - Investing in infrastructure and support for walking and cycling can increase economic growth and vibrancy. Those walking and cycling tend to spend more money locally than drivers. - Potential to improve public and active travel for workers and visitors to industrial sites, for example the Promenade to Seafield site. - The network also needs to protect routes from the city into the surrounding countryside. The recent consultation on the Pentland Hills Regional Park Strategy did not mention this. Safe routes crossing the City bypass are few in number. Working with neighbouring Local Authorities is also very important. - Cycling needs to be a top option and fast direct routes are the way forward. Interconnectivity is key. There is little help in a cycle path that connects to nothing or ends at a barrier.	- Cycle network aligned to footpaths is poor. - Cycle paths on road (not segregated) is dangerous and causes congestion. Small minority actually cycle, takes road space away from buses. - Key to delivering your aim of not needing a car to move around the city is public transport - not walking or cycling. Walking and cycling help but don't happen when it is dark or cold or wet.	- Holistic network analysis required looking at arterial routes (with public transport and segregated cycling) and Low Traffic Neighbourhoods. "Delivering new walking and cycle routes" is much less important than improving existing ones: pavement improvements, widening, more road crossings, traffic calming. - Review full network and identify gaps, deficiencies in quality. - Within historic areas an overall reduction in motorised traffic and enhanced and safe mixed cycle and pedestrian areas are a better solution than dedicated cycle only routes. - Over-engineered cycle infrastructure can impact on space and amenity. - Concern that by restricting loading and unloading, arterial cycle-routes could jeopardise the viability of local businesses. - Maintain historic setts to ensure they are safe for cyclists. - The integration of public transport will be important for promoting walking.

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Total responses - 808		
Agree 92% (740)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- There needs to be regular and plentiful cycle parking and a major expansion of the hire bikes into these routes. - Routes for walking and cycling should follow existing Lothian Buses routes which should be dedicated bus roads only: one lane both ways for buses, with a cycle lane and a good quality footpath. - On-street parking considerations are less important than the safety of people, and thus road designs should firstly accommodate safe cycling provision, secondly bus stop facilities, on and off loading, and lastly private on street parking. That should be the order of consideration. - Prioritised on main thoroughfares through the city not adding to the circuitous and round the house approach of the current quiet routes network. - Prioritise routes with high potential for increased cycle usage.		- Create good links to and within areas with high SIMD. - Experiment with temporary infrastructure. - Integrating these routes as elements of the multifunctional green and blue network, so they serve as habitat corridors. - Segregated cycle routes to avoid conflict with pedestrian users. - More joined up cross-boundary routes, which then link to local networks, which have connections to public transport, mobility/choose and ride hubs. - The criteria should be informed by the content of the Strategic Transport Projects Review 2 Case for Change report so that routes address the key issues identified. - Base criteria on taking pedestrians, cyclists, wheelers off the road space, to and through green / blue spaces, Country and Regional Parks, interesting landscapes, easy gradients and avoid poor air quality. - Criteria should assess how routes address gaps and missing links in the existing green / blue network. - Design should prioritise the needs of walkers and cyclists first, then other road users.

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes.		
Total responses - 808		
Agree 92% (740)	**Disagree 8% (68)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
		- Routes should conform to the five characteristics in Cycling by Design, and as such should accessible for use all year round and be wide enough to facilitate social distancing with good signage and provide bins. - Waterfront Promenade should avoid port operational land. The form of the proposed connection will require to take into account physical and amenity constraints. - Clarity should be provided on the responsibility for funding, delivery and maintenance of these routes, and all costs set out in the Action Programme; contributions should be proportionate in line with Circular 3/2012. - Not clear how these routes link to existing network and how these will be prioritised over motorised vehicles. - Size of the City and distances to outlying areas such as Kirkliston requires a combination of travel options to allow full benefits including commuting and leisure trips to be realised. - Clarify if works to complete the River Almond walkway would impact on Craigiehall.

| 8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes.

Total responses - 808		
Agree 92% (740)	Disagree 8% (68)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
		- Ensure maintenance of existing routes before extending new routes. - Need a much broader engagement with local people to identify a genuine network of active travel routes. - Clarity is required within City Plan 2030 on potential conflicts with policies and proposals for safeguarding and developing strategic walking/cycling routes and developing new strategic bus or tram routes (e.g. between Roseburn and Granton) as proposed in the City Mobility Plan. - With an ageing population cycling infrastructure will be of limited use in future. - Maintenance is key e.g. keeping routes gritted in the winter, lit at night, rubbish cleaned up, way finding signs cleaned and ensuring the path is free of potholes and resurfaced when necessary. Could a widespread maintenance plan also be added to any new infrastructure? - Where shared provision is made, bring in (and enforce) a code of behaviour with zero tolerance towards aggressive or obstructive cycling. - The whole city needs to be an active travel zone - with wider pavements and protected

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes.

Total responses - 808

Agree 92% (740)	Disagree 8% (68)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
		cycle routes and less space given over to cars - travelling and parked. it needs to happen now to allow social distancing measures to continue safely, especially when more people return to work. Temporary measures for using road space for cycling and walking need to developed immediately and then improved and kept. • Prioritise safe cycling for children as this will change adult habits later in the coming years.

8B As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals for the new plan to assist in delivering.

Total responses - 810

Agree 89% (724)	Disagree 11% (86)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
Specific support identified for: • Edinburgh Waterfront Promenade, Pilrig Park to Pirrie Street link, A71 Cycle Super Highway • Routes to Curriehill Station and Water of Leith path. • Extend the Edinburgh Waterfront Promenade from Granton to link with the John Muir Way • River Almond Walkway from Cramond Brig to Kirkliston	•	• Cycle and footpath link from the A90 to the A8 corridor, to enable Barnton/Cramond area and Queensferry NCR1 to travel to Edinburgh Park and transport links. • Waterfront Promenade should avoid Port operational land, take account physical and amenity constraints. • Collaborate with other councils on longer distance routes as a necessary component

• Pentlands to Portobello link, and explore extending westwards through Colinton and ending up in South Gyle, and attention to crossing the A702 and A720 roads, and consider links between this route, the Braid Hills area and Burdiehouse Valley Park. • Waverley Valley bridge would be transformational, however St Mary's Street would need to be improved as it is steep and cobbled.		of modal shift in localised cross boundary journeys and for longer peripheral commuting e.g. connections along The Wisp/A7, the A701 and A702, to Niddrie Bing area, consider Shawfair to Newcraighall Station, junctions on the A720 City Bypass to become more user-friendly for non-motorised transport, grade separation of the Sheriffhall roundabout; A7 active travel super highway, connecting with planned improvements in Midlothian; completion of A8 link, including future links via International Business Gateway; SEStran planned Portobello to Musselburgh connection. Identify the Shawfair to Lasswade Road Cyclepath/Green Network Significant gaps in the routes on the north west side of the city.

8C We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or submitted through consultation on this document. Total responses - 758		
Agree 87% (659)	**Disagree 13% (99)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
Support for: Route towards Newbridge, Livingston and A71 super highway; from Balerno down the old railway line towards Kaimes Quarry for Kirknewton (partially replacing the existing NCR 75, which currently uses the increasingly busy Long Dalmahoy Road and the steeply graded Ravelrig Road); SW Edinburgh area - safe pathway to the Pentland Hills. Suggested new routes include: • Route towards Newbridge, Livingston and A71 super highway. • Balerno down the old railway line towards Kaimes Quarry for Kirknewton (partially replacing the existing NCR 75, which currently uses the increasingly busy Long Dalmahoy Road and the steeply graded Ravelrig Road). • SW Edinburgh area - safe pathway to the Pentland Hills. • Mayfield Rd between George Square and King's Buildings. Could funnel the car traffic to Mayfield Gardens and make Mayfield Rd narrower allowing for some dedicated parking spots, non-parking cycle lane and low speed main road. • New direct routes - Roseburn to Meadows (bridges over railway and Dalry Road)	• Need to consider the impact of safeguarding these routes for active travel on other travel modes • Specifically protect pedestrians from cyclists on pavements, or narrow footpaths like the canal towpath.	• Increasing levels of e-bike ownership are a significant contributing factor in modal shift elsewhere in Europe, and should influence planning for the city region. • Engage with the appropriate parties for clear understanding of land ownership constraints, avoid allocations to deliver off-site links in third party control, unless the Council is prepared to intervene and deliver the link subject to financial contributions. Such contributions must be based on robust cost evidence. • Clarity of funding particularly for cross boundary interventions. The Council consistently interprets 'active travel' as predominantly cycling, and budgets accordingly. • Support for new strategic walking routes, must be in addition to enhancing walking provision throughout the city • The A70 corridor seems once again to be entirely ignored. • How many people do you envisage using the cycle routes? 1%, 2% of the population? 5% by 2030? You are spending money on an elite minority at the expense of others.

8C We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or submitted through consultation on this document.		
Total responses - 758		
Agree 87% (659)	**Disagree 13% (99)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Leith Bridge and the Edinburgh High Line City East - West - London Rd from Leith Walk down to Portobello. - Cramond to Joppa - Pentlands through Colinton ending up at South Gyle. - Balerno 'Green Bridge' reinstated. - Please add the 'Education Corridor' incorporating the well-established route along the north side of the Muir Wood field. - There are not many safe routes to cycle especially in south Edinburgh - the Braid Hills are a barrier and only options are main roads on either side to get around them. - Safer routes across south Edinburgh: Safer cycling and links from Gilmerton Road into city centre and Dalkeith Road into city centre - Bike path along the entire length of the bypass to encourage new cyclists to commute East and West. - Widen pavement on George IV bridge to allow for heavy pedestrian traffic volumes. - The Newbridge to South Queensferry cycle route needs investment, maintenance, and extension to Ratho and Ratho Station. - Incorporate cycle lanes into Dundee street, Lothian Road, Princes Street		- Re-use existing infrastructure (old railways) would be logical, cheaper, less wasteful and practical. Undo the Beeching cuts. - Make sure there are easy ways for bikes, and kids in bikes, to cross the city centre. - We need as many active travel links as possible for the health and wellbeing of the Edinburgh population as well as the environment. Lots of people are getting into walking, running and cycling during the lockdown. It's important to build on this new enthusiasm. - Need to invest in peripheral infrastructure first to help disadvantaged get into town and between neighbourhoods. Too much money is currently going into the city centre. - The impact on the environment and conservation of existing wildlife habitats should be of paramount importance.

8C We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or submitted through consultation on this document. Total responses - 758		
Agree 87% (659)	**Disagree 13% (99)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- A segregated cycleway on Silverknowes Road to link to NCN1 to the promenade - If the route around the Salvesen Steps on the River Almond Walkway ever happens this would create a great loop for the local and wider community (or beyond to Kirkliston), along with the Cramond to Joppa route. Upgrade River Almond walkway to tarmac or it won't get much use as a commuting route. - River Almond Walkway but include the section from the Fife Railway/River Almond Bridge east of the Airport to Cramond Brig which remains to be developed along with the section to Kirkliston. Similarly, the Cramond Brig to Cramond section of the Walkway is incomplete for cycling and less mobile users due to the current configuration of the Walkway at the Salvesen Steps. - Improve Holyrood Park bike lane, this should be rationally redeveloped. The roads in Holyrood Park should be closed to vehicle traffic. - Cowgate should be turned into an active travel link (and should not be a through-route for vehicles). - In times of austerity, minor improvements to existing routes should be prioritised, and repairs to existing ones like the Water of Leith Walkway between Damside and Belford Bridge		

8C We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or submitted through consultation on this document. Total responses - 758		
Agree 87% (659)	**Disagree 13% (99)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
where the Walk was closed some years ago due to a landslip, should be dealt with before new ventures are considered. The City Centre doesn't need 'transformation' so much as 'restoration' of the features that appeal to residents, and tourists. • Safer cycling along South / North Bridge esp when turning from there into Princes Street. • Niddrie Mains Road due to there being essential amenities along this road (healthcare centre, council offices and supermarkets). • Golf courses should be considered for active travel links currently and when any course closes. Local routes will certainly be available, and some on longer routes like the cycle path between the Burgess/Bruntsfield Links society. • Routes between all entrances to the Astley Ainslie site. • Roseburn to Union Canal is critical to provide links across the railway here, and to a track alongside the Western Approach Road. • A complete west-east link through the Royal Edinburgh hospital is necessary, and the path behind Myreside should be upgraded and widened as it is a shortcut to the canal. • A widened shared-use path along Braid Hills Drive		

8C We want City Plan 2030 to also safeguard and add any other strategic active travel links within any of the proposed options for allocated sites and/or that may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or submitted through consultation on this document. Total responses - 758		
Agree 87% (659)	**Disagree 13% (99)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Continuous footpath of 2m width along both sides of Riccarton Mains Road from Weavers Knowe Crescent to the roundabout at the entrance to The Avenue leading into the Heriot-Watt University. The road in the vicinity of the Railway Line needs straightening out for safety reasons.		

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

Choice 9 - Protecting against the loss of Edinburgh's homes to other uses

9A - Consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' Total responses - 793		
Agree 87% (687)	**Disagree 13% (106)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Damaging to well-being and community cohesion. It affects housing availability, affordability, amenity and has a knock-on effect of destroying local businesses. - Negative impact on hotels and Bed and Breakfasts. - Will help meet housing need based on existing stock and reduce the need to build in new areas. - Could create a better balance between short term lets and the resident population and aid better place making.	- Would make it unaffordable for tourists and decrease revenue for local businesses. - Short term let control area should be everywhere. - Should be controlled through licensing and enforcement. - Perception of short term let numbers and actual data is often completely misaligned and this policy needs to be driven by data. - Practicality in terms of the resources of the Planning Dept to execute this should be considered. - Needs to be implemented nationally otherwise just pushes the problem elsewhere.	

9B Create a new policy on the loss of homes to alternative uses.		
Total responses - 793		
Agree 88% (699)	**Disagree 12% (94)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Short Term Lets impact on price and availability of housing, character of neighbourhoods and amenity. - Needed to protect housing for people to live in and bring housing back into use. - Should seek reasonable balance between economic benefits of tourism, adequate housing supply and quality of life. - Should be a presumption against a change to commercial use. - Should restrict Short Term Lets to those living on the premises.	- Any restriction will make it unaffordable for tourists and result in decreased revenue for local businesses. - Overkill for any of the perceived issues surrounding short term lets. - Time consuming and therefore expensive. - May drive more people to opening up their spare rooms instead of letting out an entire home with no regulation. - Needs to be a recognition of the non-binary nature of properties in the city centre. - Create zones that allow a certain number. - Should be blanket ban.	- Need to provide a mix of accommodation including hotels, youth hostels. - Consideration needs to be given to change-of use from retail to residential wherever possible.

Choice 10 – Creating sustainable communities

10A Revise our policy on purpose-built student housing Total responses - 726		
Agree 84% (609)	**Disagree 16% (117)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Not an appropriate area for speculative building and should not be provided at the expense of housing. Should be based upon an evidence-base of the need. • Community concern over spread and potential negative impacts on neighbourhoods and availability of affordable housing. Should monitor capacity. • Need to consider overall requirement and demand for housing in the city from all sources, including visitors and students and specialist housing. • Current guidance is non-statutory and is seen as a weakness. Should be tenure blind and facilitate change of use. • Demand for student accommodation likely to decrease and should consider conversion to high-density, low cost starter homes. • Purpose built blocks are not easily adaptable to mainstream housing due to design.	• Restricting development and management to Higher Education institutions is anti-competitive, they may not have the will or resources to meet demand and should not be obliged to take on management. • Limiting growth will exacerbate housing issue. Student accommodation is more efficient use of land and frees up existing housing stock. • Requirement to locate on a direct route is onerous and overly restrictive. • Housing should not be at the expense of student accommodation where there is a need. Existing policy has not limited windfall housing development within the city. • Differing locational requirement and potential conflict in life styles between students and housing. • Provision dependant on the scale of site and investment intention. Should be considered on a site by site basis and not restricted to housing. • Limit of 10% studio flats not evidenced and fails to acknowledge importance of future proofing. Should be driven by market and demand, may be smaller sites that provide a good opportunity to provide studios not suitable for a cluster model.	

10A Revise our policy on purpose-built student housing Total responses - 726		
Agree 84% (609)	**Disagree 16% (117)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• Should be no more student accommodation. • Adding 1 in 10 affordable homes within a student demographic is not sustainable. • All future student accommodation should be on university land.	

10B - Create a new policy framework which sets out a requirement for housing on all sites over a certain size		
Total responses - 714		
Agree 78% (560)	**Disagree 22% (154)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Supports the formation of sustainable, mixed use communities. Housing must be on the same site. • Should include town and local centres, and office developments should not be excluded. Major developments should provide small-scale office and other workspace units. • Requirement should not be transferrable to another site . • Should be affordable/social housing only. • Need to consider biodiversity value of sites.	• Would have implications on development viability and may damage the long term economic outlook. • Developers of residential are different to other commercial developers and hotel operators. • Should not apply to University Campus sites or University owned land due to viability. • No evidence for threshold of 0.25 Hectare. • Housing not always be appropriate and may not lead to good place making. Should be on individual site basis with the balance of uses not restricted to housing and should adopt a range of housing numbers not site area. • Inefficient use of land as housing has significantly more policy requirements and student housing provides greater density. • Vision for land use should be a mix of public realm use. • Do not believe the housing requirements have to be on the development site itself.	• Unclear why policy is seeking additional residential housing over and above the evidenced-based requirement set out in Housing Need and Demand 2. If additional housing is required more land should be released. • Should not apply to Edinburgh Bio-Quarter as this would undermine the life sciences-led objectives. • Should be an embargo on new student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments in the World Heritage Site.

10C Create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres

Total responses – 674

Agree 84% (566)	Disagree 16% (108)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Housing complements existing retail floorspace and helps to best utilise available land and create sustainable mixed use communities within the urban area. - Will minimise travel needs and strengthen financial viability of centres and units. - Changes in retail may increase the number of vacant units and space could provide urban living, and footfall for businesses. - Promotional policy may encourage more mixed-use development, but not one that dictates that any redevelopment will require 50% housing. Policy should make specific reference to supporting proposals developing above existing single-use retail units and commercial units.	- Should not seek to stymie the primary use on these sites, undermining future investment. - Should continue to adopt existing policy framework and amend Policy Hou 10 - Housing Development to support housing uses. - Should be broadened to include other land use proposals. Housing will not be appropriate in all circumstances. Consideration needs to be given to a site's physical ability to accommodate housing and associated requirements. - Undesirable to live in these locations - Loss of this type of facility likely to result in a greater need for current users and new residents to travel further for access to retail facilities, will result in the loss of local sources of employment and a greater dependence on commuting for work. - Might be more practicable to seek to remodel these type of developments to provide housing above the retail centres.	- Could not be relied upon to provide any significant level of new housing supply. Will depend on site specific considerations and aspirations of owners. May be amenity conflicts and issues with deliverability. - Existing business and industrial estates could also provide housing and other uses. Greater flexibility should be applied to well-located sites. - Must be sufficient demand and infrastructure. Provision for sport and recreation should be considered within redevelopment including a community speedway stadium.

Choice 11- Delivering more affordable homes

11A Amend policy to increase affordable housing from 25% to 35%. Total responses – 722		
Agree 72% (518)	**Disagree 28% (204)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Appropriate ambition for Edinburgh and will help reach affordable homes target. - Must be effectively enforced. Should not be able to reduce the requirement and should require on site provision. - More achievable if a broader range of products were considered under the affordable housing description. - Should be even higher.	- Unless the whole housing requirement is planned for and met, affordability issues will perpetuate, regardless of target. - Should have regard to cumulative burden of policy requirements. Should be considered on a site by site basis. May have an adverse effect on viability and reduce housing supply. - Should be 30% to ensure viability. - Needs to be a balance between affordable housing and not prohibiting market housing coming forward. - Should be set at national level. Regional variations could add uncertainty and create distortions in the market for new housing land. - Should identify other ways of delivering affordable housing where 35% is not achievable. Should allow contributions to developments elsewhere. - Currently failing to meet delivery of 25% and until this is achieved current requirement should remain. - Land values vary across the city and fluctuate over time. May be more appropriate to vary contributions in high pressured areas. 25% should remain for urban brownfield sites.	- Subsidised affordable housing is not the only policy lever necessary to address affordability. Focus requires to be on providing more housing of all tenures. - Would like to see more detailed and credible plans set out for addressing the overall tenure mismatch between supply and demand. - Definition of affordable housing should reflect the average wage or the Living Wage rather than a figure that relates to surrounding properties. - Explicit guidance required for developers on the maximum amount that affordable housing providers can pay for these units otherwise cost of additional developer levy will fall upon housing associations.

11A Amend policy to increase affordable housing from 25% to 35%.		
Total responses – 722		
Agree 72% (518)	**Disagree 28% (204)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	• All development places pressure on the housing market and increases the need for housing, requirement should apply to all forms of development. • Need to take account of grant funding. Should be greater flexibility in definition of affordable housing in recognition of the range of alternative models for affordable homes. • Social housing should be prioritised. Affordable and social are not interchangeable. • Okay in brown field developments but could end up with 'ghetto' areas on estates. • Need a balance of homes, too many "affordable" homes not always appropriate or acceptable for the market. • 35% is likely to discourage people from purchasing. • Should let developers create separate sites. • Already surplus affordable homes.	

11B Require a mix of housing types and tenures Total responses - 689		
Agree 78% (539)	**Disagree 22% (150)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Justified by the need to ensure more affordable homes in sustainable environments. - Where there is evidence of housing needs of different types policy should address this. - Mix creates diverse communities. - Should achieve higher standards and quotas for accessible housing to futureproof housing stock for ageing population. - Should not be able to move the affordable or social housing provision offsite. - Build to Rent and the private rented sector are essential part of development portfolio of RSLs and can provide homes at a range of price levels with security of tenure. - Should support self build/collective approaches including for older adults. - Should include core and cluster supported accommodation. - Should have more emphasis on cohousing and housing cooperatives. - Should be a minimum 10% accessible homes. - Recognition should be taken of the permitted levels of local rents and affordability for certain types of property. - Should not dictate housing types which RSL's do not want.	- Mix of tenure and types change over time. May result in plan being outdated early in its life span, stifle sites and have a negative impact on viability, delivery timescales and design. - Blanket policy makes no allowances for the differing demographics. - Should be market driven and enable developers to make off site contributions. - Should continue existing policy framework with strengthened guidance. - Detrimental to RSLs-changes to grant funding may have an impact on tenures that are deliverable. - Only the broad principles of Housing for Varying Needs supported as all criteria cannot be met. - Would constrain delivery on brownfield sites, on such sites City of Edinburgh Council as landowner could impose this outwith the planning process. - Affordable housing and council housing should be the aim. - Incapable of regulating this. - Should be distinct boundaries between private and social housing.	Addressed in density policy.

11B Require a mix of housing types and tenures Total responses - 689		
Agree 78% (539)	**Disagree 22% (150)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Demographically driven decisions will be better for the longer term than commercially driven. • Should allow for design exploration with the development - to ensure best possible development. • Should promote development of a modern "tenement" as this promotes communities. • Should be in keeping with the area.		

Choice 12 – Building our new homes and infrastructure

Total responses - 1170

12A	Option 1-Council/Partners/Urban Area	Option 2-Market/Greenfield	Option 3-Blended approach
	76% (889)	6% (65)	18% (216)
	Reasons		
	Option 1-Council/Partners/Urban Area	Option 2-Market/Greenfield	Option 3-Blended approach
	- Current housing study data does not justify further land release across the city. - Focus on density, reduced need to travel offers the best opportunity to create a resilient city. Preserves green belt and allows a more compact city, which is better for active travel and would minimise impact on strategic transport network. Only option that can provide for walking in accordance with the movement hierarchy as well as helping to deliver on wider sustainability objectives. - Use of green belt land should be avoided at all costs - A more interventionist approach could bring sites being held for development forward. - Support development driven by the Council's plans and budget, rather than by housing targets set by the Scottish Government. - Concerned about the impact on small-scale light industrial and retail uses.	- Estimated cost of delivery and impact are less than with the other two options and so should be regarded as the least financially challenging option. - Even the lower number of market housing will be challenging within existing infrastructure and environmental carrying capacity. - Housing Study not robust. Should not be relied on to allocate sites. All sites in urban area should be considered suitable in principle, subject to detailed assessment. Empty sites in the centre of town should be prioritised for affordable rather than private housing. - Release of green belt is critical to deliver the required housing. Provides appropriate flexibility for a variety of housing types to come forward within the Plan period. - Option 1 puts pressure on City of Edinburgh Council and the housebuilding industry to deliver housing within constrained brownfield sites – therefore jeopardising future growth, fails to meet essential housing need and demand and would disregard opportunities to develop suitable and sustainable greenfield sites with an appropriate programme of phasing.	- Brownfield alone does not have the flexibility to deliver affordable, varied housing stock. Green belt release necessary. A dispersed growth approach would allow multiple sites to come forward at the same time. - Would ensure housing need can be met in full and allows for the benefits of new development to be accrued by existing communities and support existing services. - Option 1 has the potential to introduce further constrained sites into the housing land supply, presenting a risk that the housing supply target will not be met. There is no development strategy that demonstrates which sites it is expected will contribute to the housing supply target. Land owners may not share the aspirations of City Plan for their sites and others are at an early stage, delivery in the plan period cannot be relied upon. Expense of Compulsory Purchase Order would mean there would be little or no uplift in value through change of use to

	• Other options would result in considerable scale of development on the edge of the city, loss of agricultural land and impact on the strategic road network and housing market of surrounding areas.	• Would risk a housing land shortfall and result in complicated CPO delaying housing delivery.	residential, creating a heavy cost burden for the Council. Evidence presented in the Housing Study is fundamentally flawed. • Should be no more development along banks of Water of Leith including brownfield sites.

Housing Land Supply

- Housing Need and Demand (HNDA) calculation is not precise and conclusions relating to the economic growth of the City are dated.
- HNDA2 is the most up to date robust assessment of housing need and demand.
- Basing targets on SDP1 and HNDA2 is open to question and interpretation.
- HNDA2 Housing supply targets should be disregarded as Scottish Government rejected SDP2 – SDP1 is still the development plan.
- Housing supply target bears no alignment to the evidence.
- None of the options meets all need and demand.
- Larger generosity allowance required for option 1.
- There is no redistribution strategy from other constituent local authorities to absorb the balance of homes from Edinburgh that may not be met. Unfortunate it hasn't been possible to proceed in discussion with SESplan partners, particularly given early work done developing a Regional Spatial Strategy.
- Conclusion that in the absence of affordable housing provision there is no possible substitute to addressing the identified affordable need identified in HNDA 2 and that it should be ignored is flawed.
- The housing target should be higher. Edinburgh is capable of delivering at above the average annual delivery rate of market homes assumed in the HST. Considered that constraints on the delivery of subsidised affordable housing is a reason for a downward adjustment.
- Do not support any of the options because none are likely to provide sufficient housing to meet Edinburgh's housing need and demand until 2032.Propose an alternative Option 3, which allocates much more land for housing than currently proposed.
- Greenfield areas identified would not meet target. Additional or alternative greenfield site releases are required and should be augmented with some smaller greenfield sites deliverable in the short term

Other issues

- Object to inclusion of Inch Park- Proposal is short sighted and does not meet Council objectives.
- Object to inclusion of 227 Seafield Road and 383 Seafield. Owner has no intention of releasing the land for housing in the Plan period.
- Houses should not be built on the Westbank site. This site should be retained for leisure use and for use by the community.
- Concern from Network Rail in relation to some of the potential greenfield sites.
- Concerned about Block 31 off Alnwick Road.
- Why not encourage more development in other LA Areas?

		Supporting reps	Objections
12B	**Proposed greenfield site - Calderwood**	141	249
	Other Issues	Reasons	
		• On current transport access.	• Lacks direct public transport and current active travel arrangements along the A71 are inadequate. Site has poor connectivity and little relationship with the City of Edinburgh. It is disjointed from the main development and would be linear development. • Does not meet aim of locating new development in locations with infrastructure capacity, or where capacity can be provided. Ability to deliver additional infrastructure has not been demonstrated. • Will result in no green corridor between Edinburgh and West Lothian. • Will have a significant impact on landscape setting of Jupiter Artland and its designed landscape, would directly contravene the findings of the capacity study. • Can't ensure no damage to biodiversity.
12B	**Proposed greenfield site - Kirkliston**	156	654
	Other Issues	Reasons	
		• Would create a strong Green Belt boundary. • Delivering a new secondary school would reduce travel. • Good transport links and could be seen as a multi-dimensional hub. Train services to city centre possible after the Dalmeny Chord is established.	• Scale of development likely to be unsustainable, without a full-scale local plan for Kirkliston and major investments in infrastructure. • Least sustainable option, having the greatest environmental impact, being the least carbon efficient, and costly to deliver the supporting infrastructure. • Can't ensure no damage to biodiversity.

12B	Proposed greenfield site -West Edinburgh	145	284
	Other Issues	**Reasons**	
		• Housing Study identifies Norton Park as suitable for development. It is effective and deliverable and could contribute immediately to the housing land supply, Well contained and associated with Ratho. • Would support the creation of integrated mixed-use neighbourhoods with easy to access facilities and services. • Good access to public transport and further potential with proposed tram extension or bus rapid transit (BRT) to Newbridge and potential new rail / tram interchange at Ratho Station.	• Strategic economic gateway to the city and corridor is part of arrival experience, key land uses should reflect this. Release of land for density volume house building would not be appropriate. • Premature of West Edinburgh Study. • Not in alignment with National Planning Framework 3. • Should continue to be safeguarded for eventual relocation of the Royal Highland Showground. Can't ensure no damage to biodiversity.
12B	Proposed greenfield site -East of Riccarton	147	263
	Other Issues	**Reasons**	
		• Identified in Housing Study as suitable for development and can assist in delivering much needed housing in the south-west of Edinburgh. • Will perform as in-fill and minimise commuting. • Already a community of student flats and the Oriam -makes sense to develop here. • On current transport access.	• Site has local significance in terms of landscape setting and sensitivity, there are potential impacts on the greenbelt, poor public transport links and other technical and environmental issues are not considered • Concerned about impact on A70 and the Water of Leith corridor. • Density suggests buildings could be in the range of 4-8 storeys and unlikely to be in keeping with current settlements. May set a precedent for erosion of further prime quality agricultural land to the west. • Can't ensure no damage to biodiversity.

12B	Proposed greenfield site-South East Edinburgh	156	447
	Other Issues	**Reasons**	
		- Provides an effective site which can be integrated with the existing settlement and brought forward without any significant barriers to development. - Would be a logical extension to the city and takes advantage of the existing infrastructure. - Will provide a sustainable community within walking distance of employment. - Will perform as in-fill and minimise commuting, - Will likely become more sought after as many departments of the university are due to transfer to the royal infirmary complex. - Seems to have more concentration of commuter traffic so park and rides in these areas along with transport links would make travel to and from the centre a better option	- Scale of Green Belt release has potential to greatly diminish the physical and visual distinction between the City and the towns within Midlothian. - Concerned about the potential number of units and impact on A720 City Bypass. - New grade separated Sheriffhall roundabout and high voltage electricity power lines could sterilise parts of the allocation. - Viability and effectiveness may be affected by additional cost of proposal for underground the power lines. Can't ensure no damage to biodiversity.
12C	Do you have a greenfield site you wish us to consider in the Proposed Plan?	Refer to accompanying map	
12D	Do you have a brownfield site you wish us to consider in the Proposed Plan?	Refer to accompanying map	

Choices for City Plan 2030 Responses

Choice 13 - Supporting inclusive growth, innovation, universities and culture

13A We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh.
Total responses - 638

Agree 83% (530)	Disagree 17% (108)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Culture should be articulated across the plan as a whole. - Tourism sector may well be less sustainable in the near future. - Policies should support the development of not for profit and social enterprise. - It would give useful guidance for development management, where applicants propose a change of use or adaptability of a building in order to deliver projects and new business opportunities. - New policies for culture and tourism must include an assessment of the capacity of Edinburgh to accept more growth in these sectors without detriment to housing for residents and their quality of life. - The areas identified in Map 16 (Areas of Support) are too restrictive. - Success of this strategy depends on strong leadership and ownership from the Council, Edinburgh Business Forum, and the Edinburgh Partnership. The progress with the Edinburgh	- Supporting increased tourism in a city suffering from over tourism is not helpful in creating a balanced or sustainable economy. - It must provide a healthy and receptive ground for visiting cultural activities and visitors but importantly must not lose sight of its all-important residents and those who work in the city. - A more nuanced and detailed approach is required, not all aspects supported, e.g. parts of City Centre Transformation. - The Royal Highland Showground should be specifically identified. - Specific policy support should be provided by City Plan for the Riccarton Campus. - Wording should be expanded to provide policy support for commercial enterprises with strong relationships or functional links with the university and not permit other forms of 'standalone' development. 'Good growth' must attract start-ups, individuals and businesses to live and work in Edinburgh –	- The Edinburgh Bioquarter should be allocated to allowed mixed use development, including residential development, with an updated master plan/place brief. - RBS Gogarburn should be identified as a Strategic Office Location and removed from green belt.

13A We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Total responses - 638		
Agree 83% (530)	**Disagree 17% (108)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
Economy Strategy and the Partnership working is not known.	and retain those already living and working here - who give long-term nourishment to the city.	
• Economic policies should support quality of life in the city, and in particular the quality of life of residents.	• Does not need policy to support these good causes.	
• The plan should commit itself to policies which foster a high value, high pay economy, and create a dynamic and economically successful city.		
• Supporting a balance of sectors and opportunities.		
• City Plan 2030 must have a range of policies in place which are sufficiently agile to enable a timely citywide response to the challenges and opportunities of a dynamic technological culture.		
• The preferred strategy choice however is opaque.		
• Innovation space and incubation space specifically covered and encouraged by this policy. This choice should also reference to research.		
• By allowing for the use of EW 1d land at Seafield for energy recovery, as policy RS 3 provides for, the low carbon sector would be supported in a number of ways. One would be the facilitation of district energy based on		

13A We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. **Total responses - 638**		
Agree 83% (530)	**Disagree 17% (108)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
supply of low carbon heat from an Energy Recovery Facility. The ERF in turn could assist and potentially host related businesses in the resource recovery sector. • Problems include reuse of good housing stock by University of Edinburgh and damage caused by speculative developments. • Support needed for other communities not just city centre. • Concentration on west Edinburgh risks sprawl. • Pentland Trail Centre development as a significant recreational facility which can assist in supporting inclusive growth, innovation, tourism and culture. • Given the climate crisis new growth should be green. • Policy should be focused on well-being rather than growth. • Public spaces should not be used for commercial profit.		

Choice 14 – Delivering West Edinburgh

14A We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Total responses - 576		
Agree 76% (439)	**Disagree 24% (137)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• City Pan 2030 should take account of the West Edinburgh Study. • A balance is required between the west and south east of the city. • The Saica site (Site Ref: 281 'Turnhouse Road) should be given strong support via a flexible site specific allocation. • Important to identify individual, sustainable sites which can support a range of uses including housing. • The West Edinburgh Spatial Consultation requires further refinement. It is out of sync with City Plan and the Transportation Assessment requires re-calibration to take account of the preferred choices within City Plan. • The requirements of Edinburgh Napier University should be considered in the future strategy for the area. • Transport to and from the airport is very poor. • In all strategic allocations there should be a requirement for Class 8 Use, as a retirement community.	• The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl. • Unclear of the merit in considering future uses within West Edinburgh (without being site specific), when the vast majority of the study area is either currently allocated or is proposed to be allocated in this plan and thereafter delivered. It would make more sense to identify a wider "area of search" from the Firth of Forth to the Pentlands, to properly consider West Edinburgh in its fullest sense. • Existing road cannot cope with the traffic. • Concerns about coalescence and impacts on infrastructure in West Lothian for development close to the boundary. • An area of search approach provides no certainty beyond continuing uncertainty which would give rise to blight.	• In the absence of the further work and outcomes that Stage 2 of the ESSTS will define, it is premature to identify Newbridge (Corridor 7) and omit West of Hermiston (Corridor 8) simply on the feasibility of a tram extension. Therefore both Newbridge (Corridor 7) and West of Hermiston (Corridor 8) should be considered further with all sustainable modes of transport including train and bus rapid transit as part of an area based study of West Edinburgh. • It is unclear from the Choices document how sites within the proposed 'area of search' will be brought forward, and under what policy criteria they will be considered. It is also uncertain how this proposal allows for robust environmental assessment of site proposals (both individually and cumulatively)

14A We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Total responses - 576		
Agree 76% (439)	**Disagree 24% (137)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Need to allocate land for specific uses in order to understand the transport infrastructure required and appropriate developer contributions. - Both west Edinburgh transport corridors should be supported. - Support any proposal to improve public transport infrastructure in the West of the city including the tram extension to Newbridge and increasing capacities at park and ride facilities. - Fife Council have concerns if the expansion of West Edinburgh was of significant scale. - Safeguarding and utilising existing natural assets in a planned approach to development of strategic, interconnected and multi-functional green / blue networks is an essential part of delivering long term sustainable city growth in this area. - Although we agree that City Plan 2030 should take account of the West Edinburgh Study findings when available, it will be important for it to be interpreted in consultation with local communities. - Large parts of the area identified as "West Edinburgh'' is classed as flood plain and should	- Proposed approach risks encouraging more inner city dereliction, and the using up agricultural land. - Turnhouse Golf Course should be excluded from any development and kept within the green belt. - The 'area of search' approach creates a permissive environment for the exploitation and destruction of the west of Edinburgh greenbelt.	

14A We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Total responses - 576		
Agree 76% (439)	**Disagree 24% (137)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
be protected as part of a multifunctional green and blue network. • It is however considered that the infrastructure which is proposed to West Edinburgh such as education facilities, can be of benefit to a wider area than just West Edinburgh. • Innovation space and incubation space and research specifically covered and encouraged by this policy. • Impacts of the future recovery of the City in a post Covid-19 environment and changing requirements. • Tram route should be extended to other parts of west Edinburgh. • Needs to be coordination with development in West Lothian. • Impacts of airport noise should be taken into consideration. • As the area is noisy it's an opportunity to locate noise producing developments. • Mainline stations at Kirkliston or Winchburgh would ease pressure on existing infrastructure.		

14B 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 allocate the site for other uses. Total responses - 539		
Agree 54% (293)	**Disagree 46% (246)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• The current safeguard and reference in National Planning Framework 3 sterilises the site for alternative uses and this needs to be removed in order for the other uses to come forward, such as residential development, to accommodate sustainable and inclusive urban growth. • Reallocation for different uses could have a significant impact on Fife. • It is a good strategic site and has been safeguarded for long enough without any firm proposals coming forward. • The area is already mostly given over to commercial use and has good transport links however any developments would have to include an upgrade to the transport infrastructure. • We agree that flexibility in approach will aid delivery and welcome a dynamic approach to identifying appropriate use mixes for future development. • New uses for this site should be encouraged. • The existing safeguard seems unnecessarily restrictive. • Seems to fit well with the priority given to that corridor (International Business Gateway and towards Newbridge), with good public	• Includes reference to residential development – which should not be supported in an unsustainable and unsuitable location particularly where road infrastructure is already at or over capacity. • The identification of the Norton Park site for a specific reason and user does not justify allocation for other uses. If the reason for its identification and safeguarding have gone then there is no automatic justification for identifying the land for development without specific locational justification. • If the very western part of the site is developed as an extension of Ratho Station – then impacts on infrastructure and access to the showground should be mitigated. • Until such time as the next National Planning Framework does or does not identify Norton Park as part of the strategic airport enhancements National Development with other associated uses, City Plan 2030 is required to accord with the requirements of NPF. • As greenfield sites are not part of the preferred strategy do not agree with the change of the safeguard of this site. • Question the wisdom and desirability of further urbanising the area surrounding Edinburgh	

14B 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 allocate the site for other uses. Total responses - 539		
Agree 54% (293)	**Disagree 46% (246)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
transport links. This seems much better than the strategic area identified in the previous LDP. • Only if involved sustainable architecture and improved/restored biodiversity in the area. • Provided new uses respect its semi-rural character of the area. • Should be used for sporting uses such as a stadium venue, concert venue etc	Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city. • The Council has not provided a rationale for the proposed removal of the safeguarding and the reallocation of the Norton Park site for alternative uses (i.e. housing). • Furthermore, it is considered that the proposed deletion of the safeguarding pre-empts any future decisions by the Scottish Government on land uses within West Edinburgh as part of the preparation of National Planning Framework 4.	

14C We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange. Total responses - 527		
Agree 56% (293)	**Disagree 44% (234)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• However, it will add substantially to the numbers of new housing already proposed for Maybury/Turnhouse (HSG19), increasing the need for infrastructure and access to greenspace. • Proximity to airport e.g. noise, air quality etc. in respect of adverse impacts on residential amenity, it is not considered that it is suitable for housing. • If it is not being used as an airport it makes sense to release for other uses. • Critical that Sustainable Transport Corridors are implemented in conjunction with any proposed development if additional burdens on the bypass, bridgehead and further cross boundary trips are to be avoided. • Provision required of adequate roads capacity at the Gogar and Maybury Roundabouts and the link road between these and impact on air quality. • Mixed use development of Crosswinds should relate to other adjacent land uses and will benefit from strategic infrastructure provision. • Appropriate joined up development providing new access and infrastructure in a coordinated manner would link with other allocated sites at Cammo and Turnhouse.	• Question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city. • The City Plan should identify the site has split ownership now, this brownfield site is no longer all owned by the Airport. • At this stage it is premature to identify specific areas for development in West Edinburgh. • Danger of over saturation of development without the necessary infrastructure to support it. • Until such time as the next NPF does or does not identify "crosswinds runway" as part of the strategic airport enhancements National Development, City Plan 2030 is required to accord with the requirements of National Planning Framework 3. • Pre-empts the findings of the West Edinburgh Study and the content of National Planning Framework 4.	

14C We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange.

Total responses - 527

Agree 56% (293)	Disagree 44% (234)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Setting of A listed Castle Gogar should be protected (and mitigated) as far as possible. - Depend on the nature of the alternative uses and their layout and design. - Support measures to improve the Gogar Burn to address existing and future flood risk. Scottish Environment Protection Agency currently reviewing it. - Edinburgh Napier University request that their requirements are considered by the Council in any future strategy for development, growth or expansion in the area. - Helps to justify £41m spent on Edinburgh Gateway. - Must improve active travel and public transport. - But should not facilitate more air travel in a climate crisis. - Continued growth of air travel not guaranteed, e.g. impact of covid-19 and rise of telecommuting. - Should be used to build an alternative access road to the airport. - Helps to justify £41m spent on Edinburgh Gateway.	- If there is a realistic expectation that these sites will come forward for development they should be included within the Plan. - Traffic at Gogar Roundabout is already congested in terms of existing traffic and traffic generated from the Cammo proposals. - The focus should be on existing sites within the current LDP in the first instance and where a broader mix of land uses at these locations can help to deliver the aims and objectives of City Plan 2030. Land at Edinburgh 205 should be prioritised ahead of new allocations. - Should resist any form of greenfield development. Air transport, passenger as well as freight will for certain in any imaginable future become less acceptable for obvious environmental reasons. So we should do nothing to further facilitate it, starting now. - Short sighted, may be needed for airport growth and in the face of climate change. - Should be kept for safety reasons. - The interchange area is not well planned or used	

Choice 15 Protecting and supporting our city centre, town centres and existing offices.

15A We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Total responses – 666		
Agree 87% (579)	Disagree 13% (87)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- More focus on needs of residents and their positive effect on retail demand. - The role of town centres has changed and continues to change. Edinburgh is clearly the regional core for south east Scotland and as such the city centre has a clear and important role to play in enhancing and protecting this status. For this to be successful the appropriate transport infrastructure must be in place both locally and regionally. - Provided it is properly accessible for local residents by public transport. - Not all leisure uses can be accommodated in a town centre location. - Recognise the value of opening stores in these locations to boost the vitality and viability of protected centres. Despite this, given the make-up and composition of some centres across the city this is not always feasible hence the development of 'edge of centre' locations which can help reinforce centres. - Covid-19 has had an impact on retail and impact on 'over tourism'. - Concerned at an emphasis of its function as a tourist centre and regional shopping centre,	- The policy needs further review as online shopping has accelerated due to the corona virus crisis, a trend which is not likely to revert to what it was before. Therefore there may be a need to encourage other City Centre uses offering greater diversity. This would create a better visitor experience compared with the same national and international brands seen everywhere. - Need to recognise that what you believe the town centre to be ... has changed ... many see the town centre mentality being something of a misnomer now ... I believe we should stop using this 'centrality approach' and have something similar to London boroughs which are then governed and resourced equally. - Edinburgh City centre is under too much pressure already. - This approach has led to over tourism and destruction of the city centre. Need to restrict tourism. - Move events outside of city centre. - Should focus on town centres then city centres. So city centre not adversely affecting town centres. - Retail should be kept and protected.	Policy should set out appropriate uses and for each level of centre. In line with the town centre first approach, the city centre should be protected and enhanced as the regional core of South East Scotland. The role and function of other centres should be set out with consideration for how circumstances may change over the Plan period. It is important that Policy is flexible to allow Centres, to adapt, respond to changes and to remain relevant in the future. Policy should recognise that Commercial Centres such as Ocean Terminal can offer established and well-connected sites which can support mixed uses including residential and office use to ensure their vitality and viability.

15A We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Total responses – 666		
Agree 87% (579)	**Disagree 13% (87)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
rather than a centre for the city of which it is a part. • City Centre, while regarded as 'healthy' by many markers is being undervalued in this report, and that its status is more fragile than presented. Surprised that there is no mention of its status as a World Heritage Site and as a Conservation Area and the responsibilities therein. • Town centres are hubs for public transport and are easily accessible without private cars. Town centres, however, are often densely built up and can form canyons which trap emissions leading to poor air quality and health impacts on those who live and work in these areas. To address this, cars should be discouraged and public transport should be electrically charged. • The Town Centre first approach should allow for some flexibility. • Try and ensure that everyone in the city lives within easy reach of basic shops and services – the 20 minute neighbourhood approach. • Small independent traders need to be both protected and encouraged to operate in town centres. • Support for small convenience shops in new housing developments.	• Let people shop local where possible. • Need to meet the needs of residents rather than tourists. • Need to rethink tourism in light of the climate emergency. • Too much congestion in the city centre, both cars and buses. • Need to radically review the amount of retail space we have in Edinburgh. • Retail should be out of town and centres should focus on entertainment and leisure.	

15A We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Total responses – 666		
Agree 87% (579)	**Disagree 13% (87)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Low vacancy rates are supported by the wrong type of shops (e.g. hairdressers and charity shops). - When shared transport and reduced car access are used as part of a package, then mobility hubs can be provided with placemaking as well as just the basic transport provision. In this way new life can be breathed into town centres by creating centres for people not cars. - Visitors should be encouraged to move beyond the City realm. - Hope in doesn't result in increased commercial council tax for small businesses though. - However still requires flexibility to accommodate uses that cannot be accommodated in existing centres or are unsuitable. This policy to encourage tourism in City Centres appears to conflict with the suggested policy regarding hotels. - Need to limit shops selling tourist items. - Princes Street needs improved: top shopping and dining. - Support the 15 minute city currently promoted by world cities, aim to develop self sufficient communities within Edinburgh. This would reduce pressure on the city centre, including pollution and stress caused by long commutes.		

15A We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities.

Total responses – 666

Agree 87% (579)	Disagree 13% (87)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Needs to be a major switch from retail to residential. • A mis of activities should be proposed; shopping, offices, leisure, culture, entertainment and tourism and must be in balance.		

15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647

Agree 83% (536)	Disagree 17% (111)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• But the allocation of further land for development and this will result in the identification of new local centres. • Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. • The place principle must again be at the forefront of planning and decision making here.	• While some areas maybe at capacity this is not the case in other localities (e.g. Gilmerton). Again many town and local centres are restricted with little to no land availability for new retail/leisure provision. • Too prescriptive, too top down. • Do not fully agree with the conclusions of the Commercial Needs Study that there is no capacity or need for additional retail provision beyond Town/Local Centres.	

15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647

Agree 83% (536)	Disagree 17% (111)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- There may be occasions where a commercial needs study does not provide information on the non-commercial benefits of a retail or leisure development within a community. - We think the Commercial Needs Study needs a review having regard to the corona virus crisis which has emphasised the value of local centres but also small scale local provision within easy walking distance. - Yes, but how would new farm shops fit into this policy? - Much stronger action is needed to maintain and support local centres. - Over development for years. - Will strengthen and support centres. - Success depends on improvement in public transport and parking facilities to ensure that all local shopping needs are within direct accessible reach. - A more positive policy should be adopted which promotes small-scale shopping facilities where there is evidence of a lack of food shopping within walking distance. - Cityplan should promote the reinvigoration town and local centres through partnership-based place-making involving City of Edinburgh Council, local businesses and communities.	- Commercial Centres including Ocean Terminal have an important role to play in providing retail, leisure, community and visitor facilities. Commercial Centres will need to adapt to meet changing needs. - There should be a presumption in favour of any food and other necessary retail anywhere, it is very important to promote shop local wherever possible. - Not always be possible to provide new shopping in town and local centres and some flexibility may be required to permit development outwith local centres. The importance of food stores has never been so well highlighted than during the current Covid-19 pandemic. - Choice states that proposals will only be permitted where it is justified by the Commercial Needs Study. This an unusual approach, given that if a proposal is located within or 'edge of centre', of a town or local centre, then Scottish Planning Policy fully supports such development as it is of benefit to the health and vitality of these locations. - Commercial Needs Study acknowledges that qualitative improvements can still be required in certain pockets across the city.	

15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647

Agree 83% (536)	Disagree 17% (111)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- In the post Covid-19 environment, consideration should be given to ensuring that everyone can access essential shopping services within walking distance. - However local centres may also be important service-provider locations not solely suited to addressing a lack of food shopping. There should be a degree of flexibility particularly on changes of use applications. - Plan might benefit from giving flexibility for such uses in other locations where they are brought forward on a temporary basis to activate vacant sites or spaces, or where they meet particular community needs such as space for local/amateur groups. - However, more work now needs to be done to provide food shopping locally. - Need to take into account the quality of current provision as well, chain shops have proven unreliable. - Social needs are just as important as commercial needs. - Everyone should have access to the services they need within 15 minutes walking distance.	- Competition is not a planning matter and it should not be for the planning system to protect existing out of centre retailers from this. - The loss of certain local retail, commercial and community facilities can have a very detrimental impact on the communities that they are intended to serve. We have seen in the city centre the loss of many businesses that have provided essential services and employment to local residents as many have been converted into tourist-focussed enterprises. If the city centre is to remain a place that people want to live in a sustainable manner it is important that the LDP provides protection against uncontrolled change of use of such local businesses. - There should be no requirement to justify new shopping or leisure development in existing town centres. - Forcing people to walk to small scale proposals is social engineering. - Local shops tens to better serve local population, including growing populations, and their needs and decrease trips. Local shops should be promoted everywhere. - There are lots of leisure activities where space in the city centre is unsuitable. So a limit is not best for Edinburgh's residents.	

| 15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647		
Agree 83% (536)	**Disagree 17% (111)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
	- The market should decide. - Difficult to predict the future of retailing particularly post Covid-19. - City centre not well served by food shopping.	

| 15C We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

Total responses - 609		
Agree 88% (533)	**Disagree 12% (76)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- We fully support the LDP reviewing and identifying new town/local centres. We believe one such new Town Centre should be afforded to Gilmerton. - We support the review of existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas. - Many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. - Better integration and a more logical arrangement of villages, council wards and	- The intention to 'support' walking and cycling sounds more like an intention to impose walking and cycling. - Stop basing everything on cycling as Edinburgh is not a flat city. - Some people have mobility issues. - Concerned about new centres being developed on the periphery of city on greenfield sites.	- This work should be undertaken and consulted on ahead of the proposed plan consultation. - Midlothian Council considers that development of any new retail centres should be small scale, focussed on convenience shopping, and restricted to cases where new or existing communities are poorly served by convenience shopping within walking distance. Any such development would have to be fully justified, and the effect on the vitality and viability of any existing centre would have to be considered.

15C We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

Total responses - 609

Agree 88% (533)	Disagree 12% (76)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
community council areas. This should be about sustaining communities each with a 'hub' offering local services to which local people can identify and interact. • Any such review has to start from the premise that existing town and local centres are to be encouraged. It will mean upping the infrastructure in most if not all cases. • There are many clearly defined out of town existing village centres which require policies directed at supporting them. • Accessibility of public transport should also be a consideration. • Consideration should be given to reducing the boundaries and restricting the areas of centres or including residential as appropriate uses in the centres to support existing services and to combat the decline of High Street retailing. • Town centre boundary for Portobello be extended to incorporate the Aldi store. • What if we thought of Edinburgh as a network of 15 minute neighbourhoods? • Wary that such changes have the potential to undermine existing centres if redrawn boundaries lead to important parts of existing centres being excluded, existing protections being removed or diluted, or new local centres		• After Coronavirus, regarding "how retail trends develop" etc - and may be among the first to require revision.

15C We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

Total responses - 609

Agree 88% (533)	Disagree 12% (76)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
being created simply to justify new developments. • Support the policy option particularly the Town Centre designation indicated for Leith Walk and local centres in Leith. • Development of arterial routes must protect existing local centres. • Must identify local parking provision needs including for those with mobility issues. • Proper segregated cycle routes are required. • Include out of town new centres.		

15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Total responses - 519

Agree 55% (285)	Disagree 45% (234)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• No-one knows how things will be post Covid-19, so a huge amount of rethinking may need to be done. That will require flexibility of approach.	• Support the option to remove supplementary guidance, preferring to embed such guidance within the plan. This might be done as appendices. However, this preference does not preclude supplementary updates to the Plan.	• We are doubtful about the ability of planners to predict with any accuracy the future pattern and trends of retail activity. We are not sure of the value of these options.

| 15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Total responses - 519		
Agree 55% (285)	**Disagree 45% (234)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- It's an evolving and changing sector and it will be easier to adapt and change if it is Supplementary Guidance. - Although you may need the flexibility as habits change. We should also be more imaginative with existing town and shopping centres to breathe new life into them. - In supporting the continuance of Supplementary Guidance recognise the inherent flexibility of this approach, but this implies that resources will be available to enable this flexibility and agility in speedily changing markets. - It would appear be more easily tailored to the local environment than centralised guidance being included in the full City plan. However, we do feel that the existing supplementary guidance could be enhanced, or more carefully enforced than it appears to be at times.. - Guidance should be extended to local centres across the city too. - But it requires to be subject to proper consultation and approval process to ensure adequate scrutiny. - Car parking should feature in the guidance.	- Policies on retail should be part of the development plan and thoroughly considered through independent examination. - Support the use of retail guidance in the Plan. Incorporating the guidance in the Plan gives a surer way of ensuring the guidance is aligned with other guidance, policy, requirements, etc. of the Plan. Supplementary guidance is too complicated and tends to allow loopholes. - Use of guidance sounds like an imposition. - Forcing trend rather than adapting results in failure. - Need a universal approach. - Covid-19 has hastened decline of traditional retail. Requires a more wide reaching strategy. - Include within appendix of the plan, but update more regularly.	

15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Total responses - 519

Agree 55% (285)	Disagree 45% (234)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Need coherent vision for town and local centres that's about services, modes of working and social connections too. Retail and work are moving online. Social isolation and mental health is the next crisis that planning will be asked to solve. Local centres that have 'work from' spaces reduce travel needs and bolster local businesses. • Need to promote local shops rather than chains.		

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh.

Total responses - 631

Agree 58% (364)	Disagree 42% (267)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• We see hotel provision as part of mixed developments with retail, commercial and residential development. • New hotel provision should not be at the expense of existing residential accommodation. • The City centre has already been overdeveloped with hotels etc. • Although there is often local resistance to hotel building, it will be needed if we are	• Hotels come in all shapes and sizes and respond to varying demand profiles. You should not control where/how some of these more boutique or niche hotels are proposed. • Tourism industry leaders have admitted there is an over-supply in hotel rooms. They state this is already having a "negative impact" on occupancy levels and room rates, even before a string of proposed new developments across the city are	• Why would we need to take action to support more hotels? These are commercial enterprises.

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Total responses - 631		
Agree 58% (364)	**Disagree 42% (267)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
moving away from offering full property short-term lets. • We support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. • We support the need for differing grades of Hotel, location and throughout the city to ensure the spread of related economic benefits. • Some flexibility should be built into this policy so as not to preclude hotel development in other viable and suitable locations. • However requirement for hotel sites to deliver 50% as residential accommodation may render a number of sites as unviable. • This is supported only for more higher value upmarket proposals encouraging higher spending visitors. • City of Edinburgh Council should be mindful that the impact of COVID-19 on Edinburgh's Tourism sector. There is no clear picture on the outlook for Edinburgh's tourism sector post CoVid19. The city has a far stronger international visitor profile than Scotland as a whole (44% v 23%), which in most circumstances would be considered a strength, but is now a real challenge as this	either completed or come up for planning permission. • Supporting unabated hotel provision in local, town and commercial centres without an evidence base of the demand runs the risk of undermining the provision of suitable sites for conversion or new housing under Choice 12A. • Before Covid-19 this was an important area of jobs, investment and economic growth for the city. it is too early to say if there will be long term changes to the growth of the tourist market and the plan should be flexible to adapt to any change in expected hotel demand. • Hotels are a key economic driver for the City and the most appropriate location is the City Centre. Whilst the above locations should also be encouraged, so should the City Centre. • An assessment is needed of how many hotels of different types Edinburgh requires. This is related to an assessment of the capacity of Edinburgh to continue to accept tourism growth. New hotel construction, often on brownfield sites, prevents the use of such sites for housing. • To protect the viability of the city's existing hotel stock and the jobs of those that they employ there should be a moratorium on all future hotel development for the foreseeable future. • Residents first, visitors second.	

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh.		
Total responses - 631		
Agree 58% (364)	**Disagree 42% (267)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• market is likely to be far slower to recover, so demand levels are likely to be substantially down on 2019 levels for years to come. • As long as any building goes hand in hand with housing as outlined in other parts of the report. • Hotel development should be allowable anywhere in the city centre. • Ocean Terminal could support new hotel and tourist accommodation provision including short-stay apartments. Hotel provision at Granton would help bring about proposed tram line. • We agree with supporting hotel and purpose-built serviced self-catering accommodation where it frees up housing which is currently used for short term lets and enables this to be returned to long term residential use. • Additional hotel rooms though should be subject to rigorous challenge in the current environment so that the best use is made of any development space. • Portobello has no hotel, ideal area for one. • Yes if it stops holiday lets then more hotels are fine. • Need to be selective, and not more of the same. Lack of conference accommodation and self-catering, but not air BnBs.	• There was signs of decline before Covid 19. Therefore to protect the viability of the city's existing hotel stock and the jobs of those that they employ there should be a moratorium on all future hotel development for the foreseeable future. We believe that this position also strongly fits with the new CEC approved and EHA endorsed Edinburgh 2030 Tourism Strategy and the stated desire to manage future tourism growth and achieve an effective balance between the needs of the city's resident, businesses and visitors. • Hotels must be carefully sited, and should be careful control over how many new provisions are allowed in each area over short times, and all kinds of accommodation must be included, not just traditional hotels. Should be careful assessment of whether new such development is appropriate. • Must look at all kinds of short stay accommodation together. • In the face of the climate emergency should be discouraging more travelling, tourism and associated hotels. • Homes should be prioritised over hotels and air Bed and Breakfast.	

16A - We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Total responses – 507

Agree 89% (449)	Disagree 11% (58)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Consideration could be given to health or social needs being used in commercial sites; rehabilitation, GP, health checks, community services etc. • Meeting demand for alternative uses such as increased leisure provision maintains vibrancy and attractiveness of local centres. • We agree that flexibility in approach will help to address the changing nature of retail and leisure uses and adapt to the way we now live in the city. • Inevitable given changes in retail trends and post-Covid considerations. • This could bring more mixed use/evening activity. • With falling demand for retail floor space and a national over provision this policy seems appropriate and essential. • The demand for retail space has dropped in general, with a move towards consolidation in prime retail centres and locations. This means a lack of demand for many previous retail stores which now need a new purpose. If a change of use can be successfully promoted, this will retain footfalls and activity in the city. • The irreversible trend is 'big' retail being killed off by the internet, and for smaller specialised retail to	• I think there should be large-scale shopping opportunities in cities that don't require having a car to travel to out-of-town commercial centres. • Wouldn't want to see wholesale takeover by leisure forcing closure of remaining shops. • Some of Edinburgh's traditional shopping centres or "high streets" are in a relatively heathy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. • Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradually loss of character in in many local shopping streets as major chains and charity shops become more dominant. • We believe that healthy retail provision within the existing town centres is an essential part of the life of local communities, particularly for residents with less access to transport. • Retailer rely on other retailers to provide footfall. • Not sure how that could be achieved when we are trying to reinvigorate our centres.	• Increased leisure facilities in the outskirts could be welcome.

16A - We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.		
Total responses – 507		
Agree 89% (449)	**Disagree 11% (58)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
adapt and develop. Similarly with hospitality, big chains are struggling. All this was happening before Covid-19 which has rapidly accelerated the change. • Commercial Centres should be permitted to accommodate any growing demand for retail and leisure floorspace. • The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre. • New residential development, either as redevelopment or conversion, should be supported when it can be demonstrated that the increase in resident population or the decrease in vacancy would improve the centre. The seven existing Commercial Centres in Edinburgh play an important role within the defined hierarchy of centres. They are spatially dispersed across the City area and are as 'local' and easily accessed for many consumers as the sequentially preferable town centres or local centres. • In particular for Princes Street more mixed uses will provide incentives to bring locals into the centre. • Not enough youth or non-cinema entertainment areas in the centre. • Libraries should act as community hubs.	• This should be related to an assessment of the capacity of Edinburgh to continue to accept tourism growth. • You should not disrupt the natural demand vs supply approach. The use of space naturally develops based on demand. • The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre. New development, either as redevelopment or conversion, should be supported when it can be demonstrated that the decrease in vacancy would improve the centre. • Too prescriptive. • Leisure provision is wholly appropriate within Commercial Centres, complementing the existing retail offer and improving the attractiveness of a centre to consumers. • Market interest for leisure uses at Commercial Centres is clear and additional flexibility to accommodate such uses on sites such as Meadowbank Retail Park is welcome and positive. • Town centres should protect usable retail floorspace. • Alternative uses not just leisure.	

16A - We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Total responses – 507

Agree 89% (449)	Disagree 11% (58)	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Reduced demand on the city centre is important for the future of the city. Need to entice locals to come to the centre for activities other than retail. • Yes if reused for housing or hotel use. • There must be a finite amount of retail space the population can support.	• Shopping centres should focus on retail, city centres on leisure and entertainment. • Not clear what type of leisure development.	

16B We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres.		
Total responses - 485		
Agree 90% (435)	**Disagree 10% (50)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• What support will there be? Active, or passive, by not objecting to new proposals? Impact of Covid-19? • Providing that there is an allowance to repurpose the space in the event that it is clear and demonstrable that there is no demand for office accommodation as proposed. • Policy should support office use in Commercial Centres in light of the accessibility of this space and changes in retail trends which may mean more vacant retail space in commercial centres which could be adapted to accommodate alternative uses and to increase the vibrancy of the Centre. • In addition, City Plan 2030 should recognise the growth of home-working (full-time and occasional) encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes. • Commercial centre adjacent to office space provides the possibility of nearby leisure and refreshment activities for office workers and the ability to use spare time and lunch breaks to make purchases. It also provides a ready supply of potential clients nearby to the commercial development.	• We doubt if the demand will be there, except as part of the new pattern of working. • Less need after Covid-19. • Lots of office space sitting empty. Should reuse and recycle. • Will add to congestion and pollution.	• A policy that supports and encourages rather than requires office development to be in commercial centres would be preferable. • Question how this may work in practice and consider that there may not be strong occupier demand in these locations.

16B We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Total responses - 485		
Agree 90% (435)	**Disagree 10% (50)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• No objection to this as long as any development is supported by appropriate transport infrastructure. If it is to be located on the west side of Edinburgh, consideration must be given to cross boundary travel in consultation with partner authorities. • The policy is necessary to meet demand when there is limited scope for development of strategic office centres within the central area. • We agree but only where there is a clear economic case. Otherwise the office could become a liability if it remained unoccupied. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. • Include provision of green space for mental health benefits. • Small local offices should be encouraged to reduce travel to centralised offices at time of climate change.		

16C We want to support office development at commercial centres as these also provide accessible locations. Total responses – 479		
Agree 78% (372)	**Disagree 22% (107)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Concerns with placing too much emphasis on locations at Edinburgh Park/ South Gyle, the International Business Gateway and Leith to deliver substantial new levels of office floor space. These peripheral locations do not have the same level of occupier demand as the city centre. - The Plan should acknowledge that these locations are preferred locations for office use in the City and that mixed-use development (commercial, leisure, housing, hotels) in these locations would be appropriate to complement. - Failure to do more than simply 'support' office development in these locations, rather than resist it elsewhere, will dilute the delivery across the city and undermine the success of the policy. As a consequence, for part A to succeed in meeting its objectives, parts B, C and D are unnecessary and should not be pursued as part of the LDP. - The changing work practices enforced through Covid-19 restrictions are likely to have long term structural implications. Therefore recommend that City of Edinburgh Council review the office supply and demand assessment before finalising their proposed office policy.	- There are already discussions going on in the commercial property sector about companies reducing office space to save costs now Covid-19 has shown them how easy it is to operate with staff working remotely. This will radically change availability of office space and most likely reduce demand considerably. - This proposed preferred choice of promoting office use suggests a restriction of other uses at South Gyle when elsewhere in the plan (choice 2, map 2) it is suggested that the area could accommodate high density residential use. The proposed choice appears to go against the overarching principles and policies of the plan which seek to encourage all forms of development in the most accessible locations. - Too much empty office space already. Should be refurbished or changed to housing. - Create policies to prevent office accommodation with short lifespans, which is not sustainable. - Forcing people into areas puts a strain on transport infrastructure. - Sites that rely on intensive car use for commuting should not be permitted. - Infrastructure not good enough at the Gyle or Leith.	- This should not preclude the opportunity to introduce a greater mix of uses in these areas. - Leith Docks is identified as a potential location for new business and industry. We are aware that it is currently an industrialised area, nevertheless because it is in the broad vicinity of Imperial Dock Lock, Leith Special Protection Area any potential impacts must be properly assessed and the forthcoming LDP ensure that this site is safeguarded.

16C We want to support office development at commercial centres as these also provide accessible locations. Total responses – 479		
Agree 78% (372)	**Disagree 22% (107)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Any proposals for additional office space within or outside of the strategic locations should be subject to critical assessment of likely demand. • However, as Edinburgh is the regional core for south east Scotland it is essential that CEC engages in a regional collaborative approach to strategic office space provision so neighbouring partner authorities are not negatively impacted. • Yes, in principle. We note the statements about the significant demand for office space in Edinburgh, but we are aware of a number of instances, where recently constructed office buildings have remained empty for several years before occupation. What are the reasons for this and can these be mitigated? Could empty office buildings have a temporary use for accommodation? • The market fundamentals for new office development are strong, with high take-up of available space and rental values around £35 per square foot. These rental values are among the highest in the UK outside of London and the south east of England.	• City centre should be for residents, tourists and light commerce. Offices should be outwith the centre. • Need this space to be used for social housing. • Lack of infrastructure and facilities at the Gyle. • Encourage companies to reduce their need for offices and work remotely. • Need sufficient parking or reliable transport links from park and ride sites. • Concentrate office space in commercial areas rather than the city centres. • Should be mixed uses not just offices (dead spaces in the evenings). • Live and work local, no more mass population movement. • International Business Gateway represents a hollowing out of the inner city.	

16D We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Total responses – 403		
Agree 65% (260)	**Disagree 35% (143)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• There are already discussions going on in the commercial property sector about companies reducing office space to save costs now Covid19 has shown them how easy it is to operate with staff working remotely. This will radically change availability of office space and most likely reduce demand considerably. • Locating space in the city centre would make use of existing good public transport links and would benefit from any proposed new/improved infrastructure. • We agree and the loss of suitable office development sites has been a concern in the city. Any requirement should only be demanded where a development scheme suggests a clear opportunity for the use of the office space. • The policy is necessary to meet demand when there is limited availability of sites for 100% commercial development. • Reservations about the use of the term "significant". Edinburgh is unique in having a strongly residential city centre and benefits from residents keeping the city centre. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. The level provided should be	• The Choices document does not explain how "significant" the requirement for office floor space should be. The Council is also promoting at the same time a brownfield housing development strategy. Is the requirement for "significant" office space consistent with this? The Council will also require to demonstrate in preparing any future policy that the requirement for "significant" office space will not have an adverse impact on development viability. • This could be supported, but only in areas with demonstrable demand and appropriate social and transport infrastructure to support it. It is important to note that the impact of Covid-19 is not yet clear but there could be implications for the office sector. • So far mixed use development has meant offices, hotels, retail, bars and entertainment and no housing. This is not mixed use development and we would not support yet more offices. • Let the market decide, within the limits of an overall plan. • Large offices do not need to be located in city centres. Their presence will increase the need for commuting and create empty spaces once they close at the end of the working day. There will need to be some offices to provide services and employment for people living in the city centre	• This can be encouraged but should not be a requirement if it would preclude very good developments that did not include office space from coming forward. • Delivery of office uses within mixed use development will be dependent on market forces and should not be forced upon developers of those sites.

16D We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Total responses – 403		
Agree 65% (260)	**Disagree 35% (143)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
tailored to the specifics of each site, rather than a one-size-fits-all approach. • For the vitality of the City, employment should be encouraged to return to the City Centre. It has been the replacement of offices by hotel development that has been a major factor in the decline of viable retail outlets. • If there is demand and need for this. • But do not lose sight of the beauty of the centre of the city and end up with too many offices and the centre becoming dead at night. • Need affordable office space for start ups.	but the use of the word significant is not appropriate. • Not sure we want a policy that always prioritises office floorspace over other uses, e.g. hotel/residential/shopping/leisure. It is possible to deliver all of these functions within the same building? • Some locations within the city centre will be more suitable to office development than others. Request that any future mixed use planning submissions are considered on their own merits, rather than the Council enforcing a 'blanket policy' requiring a certain percentage of any mixed use development for office floorspace. • Need this space for social housing. • Should favour out of city centre office locations. • Better used for leisure, retail or housing. • Too much of a heritage impact. • There is enough office space already. • Increases travel to the city centre and detracts from local communities. • Needs Covid-19 rethink. • Let the market decide.	

16E We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Total responses - 403		
Agree 65% (260)	**Disagree 35% (143)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Reduced need for office space will allow more housing development so reduce the office space to housing ratio. - The important issue is to secure the successful and sustainable regeneration of the area. It is important therefore to remove unnecessary planning obstacles that impede the development of residential properties in the area. - An area of Leith (around Victoria Quay) has been designated as a strategic office location on maps 21 and 22. We note that much of this land comprises former commercial units which have been converted into residential flats (particularly at upper levels). We would therefore suggest that this area is widened and allocated for a mix of uses so that offices can come forward alongside residential. It will be important for the emerging local development plan to ensure that policy is in place to protect existing employment uses in Leith and encourage office development as part of any residential development. - Agree in principle however support more mixed use sustainable communities rather than purely office or single use.	- What is the priority - offices or homes? - I'm in favour of residential development that includes alternative ground and basement floor uses e.g. commercial, business, retail, etc. This could also include nursery provision, GP surgeries, etc. - It is unclear which areas have residential development consent. As detailed our preference is to improve office, light industrial and manufacturing provision with the area. - As worded, this is contrary to multi-use development policies. - We have a high demand for housing in Leith. Mixed use housing with small scale business, retail, creative industry start-up space, is in keeping with the area's heritage. - Land shortage of housing already being experienced in Edinburgh. If followed through - a site of commensurate scale must be identified. - Mixed use is good and in Leith it works.	- This should be done in consultation with the landowners. - Leith Strategic Office Location could be extended to include Ocean Terminal to reflect potential for this site to be redeveloped to provide office space alongside other mixed-uses including retail, food and drink, leisure, tourist accommodation and facilities.

16E We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent.		
Total responses - 403		
- Areas with residential potential are also recognised on existing sites where there is potential for intensification of use and redevelopment whilst protecting existing office floorspace. - Leith office initiative never took off due to location and poor transport links. - As long as housing sites meet local needs.		

16F We want to continue to support office development in other accessible locations elsewhere in the urban area. Total responses - 475		
Agree 83% (392)	**Disagree 17% (83)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• If someone wants to develop an office there shouldn't be any in principle objection. • Support the idea of office development in the New Town area particularly focused on addressing the needs of residents. There is an increasing trend towards work portfolio careers and working from home (which has been accentuated by the Covid-19 pandemic) and we would support the development of office space on a short term lease basis and for small companies and single individuals as a way to encourage entrepreneurship within Edinburgh. • We advocate the creation of mixed use neighbourhoods. • Office use within the strategic centres is supported but the emerging development plan needs to accept that the loss of office use to alternative uses can be beneficial. As the requirements for offices change over time, a policy which requires their retention will not necessarily retain employment – which should be the aim of policy. • It is necessary to support the market demand for mid to smaller offices. The travel demands help to justify the cost of transport links to urban areas.		• We do not support office development in other accessible locations elsewhere in the urban area. • Impact of Covid-19 changing demand and availability of office space. • Should let market control this. • Concentrate on housing in these areas. • We have enough off space, with new developments sitting empty. • Need to extend urban areas too. • Too vague. • Buildings use of offices and residential are not compatible. • Redevelopment opportunities should be used for housing not offices. • Transport routes are radial, should concentrate it in the city centre. • Facilitate working from home.

16G We want to identify sites and locations within Edinburgh with potential for office development. Total responses - 467		
Agree 77% (360)	**Disagree 23% (107)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Agree. These should be served by public transport to enable sustainable commuting. - Support but request that any future designations are 'market informed' based on current requirements and demand. - Encourage dialogue with neighbouring local authorities to understand where business location or co-location could increase inclusive growth without detriment to the business itself. It should also take account of new working practices resulting from Covod-19. - Office development should be a key part of the plan, including potentially safeguarding some core parts of the wider city for the promotion of offices. However, as a ten year plan the city may need to amend proposals in the light of market experience and appetite. - Gilmerton Gateway should be identified as such a site. - ONLY if a) this is on direct public transport lines and doesn't require additional parking provision b) the offices are part of mixed-used - Bedford Barracks site for mixed use. - Should be brownfield site and limit amount of car parking in them, with significant public transport provision. - Be sensitive to specific areas, tend to be multi level and will not be suitable for most sites.	- This should really be demand led. If there is a city centre zone and regional hotspots where office use is supported, it should not need to be supplemented. The majority of office occupiers will gravitate towards the established markets in areas with the appropriate infrastructure. - We wish to encourage more mixed use development. - Surely that is for property developers to do. - Impact of Covid-19 will radically change demand for office space. - Too many offices already many are vacant. - Just heightens housing provision shortfall. - Greater use of home working and video conferences. - Seems contrary to reducing traffic levels. - Public transport is on radial routes so should focus on city centre for offices and outlying areas for housing.	

16G We want to identify sites and locations within Edinburgh with potential for office development. Total responses - 467		
Agree 77% (360)	**Disagree 23% (107)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Within city not outskirts. - Not at the expense of housing developments. - Should be joined up at regional level with other councils. - Only where land is unsuitable for other uses and unoccupied for some time. - Not clear how you are going to assess sites and existing provision and empty units. Occupation should be prioritised		

16H We want to introduce a loss of office policy to retain accessible office accommodation. Or we could introduce a 'loss of office' policy only in the city centre. Total responses - 450		
City Wide 43% (193)	**City Centre 25% (112)**	**No change 32% (145)**
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Edinburgh city centre has been unsustainably weighted to tourist and commercial development in recent years, and in order to maintain a mix of local employment opportunities we would encourage the maintenance of existing office space. - This might change as a result of Covid-19. - There is a need and market demand for office space at locations other than the city centre.	- I support a loss of office policy in the city centre and suggest the loss of office policy should just apply in the city centre. - Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. The level to be provided or retained should be tailored to the specifics of each site, rather than a one-size-fits-all approach. - This is excessive. Developing sites at increased density in central areas will be challenging given	

16H We want to introduce a loss of office policy to retain accessible office accommodation. Or we could introduce a 'loss of office' policy only in the city centre. Total responses - 450		
City Wide 43% (193)	**City Centre 25% (112)**	**No change 32% (145)**
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Support in the context set out with existing office space provided as part of denser development. • A 'loss of office policy' only in the city centre would disadvantage areas like Leith capable of accommodating employment uses as part of an accessible mixed community. • Supports a loss of office policy city-wide to ensure the retention of existing office space throughout the city in a variety of accessible locations. • Support a loss of office policy city-wide, and welcome the mix of small-scale office and commercial, cultural, and residential space which gives Leith its unique character. However concerns that extending a broad-brush 'loss of office policy' to Leith could reduce the opportunities for providing affordable housing on brown-field sites which currently have office use, or for amending an existing planning consent to convert office space to residential. • However, needs to be analysis of existing offices and occupancy. • Financial sector is well established and this must continue. • Policy should allow flexibility if there is no demand.	heritage constraints. It would be more reasonable to allow change of use if it could be demonstrated that the existing use was no longer marketable. • Covid-19, an issue which is likely to change the requirements for foreseeable future. It may be the case that in future more homeworking is encouraged by employees, leading to less traditional office space being required. In such changing times the policies should remain as flexible as possible. • Risk of properties remain vacant instead of being redeveloped. • If policy is required, there should be an exception for offices that are no longer fit for purpose and that these can be redeveloped as the market demands. • There should also be a recognition that the physical constraints of listed buildings in the city centre may not be capable of meet modern office requirements on a financially viable basis and existing offices may not currently be located in the most accessible locations. • Request that any new policy contains a provision which allows small-scale changes of use. • For the vitality of the City, employment should be encouraged to return to the City Centre. It has been the replacement of offices by hotel	

16H We want to introduce a loss of office policy to retain accessible office accommodation. Or we could introduce a 'loss of office' policy only in the city centre. Total responses - 450		
City Wide 43% (193)	**City Centre 25% (112)**	**No change 32% (145)**
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- Needs to be in supplementary guidance rather than the plan. - City centre has the greatest need for office space. Further outside the city space exists and a lot is vacant. - Converting offices to residential results in substandard accommodation.	development that has been a major factor in the decline of viable retail outlets. - Need people to live in the inner city. - Leave it to market forces. - There is enough office space and lack of residential property. - Should facilitate working from home. - Conflict between policies promoting mixed use and policies promoting separate uses. - Redevelop not required office space for housing.	

16.2A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations; Leith Docks, Newbridge, Newcraighall, Edinburgh Airport Crosswinds.		
Agree Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223	**Disagree** Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- It would be helpful to have these areas close to existing housing so that people do not have to travel so far to work. - There are opportunities to improve blue green infrastructure at all of these sites, perhaps some more than others. Although they will be complex to develop and require partnership approaches to deliver but will be worth the effort because they will result in multi-benefit, enhanced natural capital, sustainable, resilient places. - Premature to identify Crosswinds and Newbridge in advance of conclusion of the West Edinburgh Spatial Strategy, the findings of which should inform the LDP. - There is an urgent need for modern business space, including industrial and logistical space, to support distribution and other business services at a local level. - Many of these industrial estates will be close to the end of their building cycle life in the near future. Also many of these industrial estates are	- Newcraighall is already massively overdeveloped. The Traffic infrastructure is bursting at the seams already. - We do not support Newbridge and Newcraighall as more sites in these areas could further erode green lands and prime agricultural land. Also the landscape quality of existing development is poor. - Insufficient public transport at Newbridge. - Newbridge is out of town and bad traffic congestion. - Traffic volumes near Crosswinds bad already. - Newcraighall is gridlocked due to the available roads and the congested retail park next door. The last thing needed at Newcraighall is more development. - Leith bad for transport links. - Industry should be kept away from residential areas. - Newbridge and Newcraighall need better transport links. - Cannot envisage much demand for industrial floorspace in a strategic business area (Leith).	

16.2A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations; Leith Docks, Newbridge, Newcraighall, Edinburgh Airport Crosswinds.		
Agree Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223	**Disagree** Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
in areas which are now predominantly residential use in nature. However, important that the stock of industrial accommodation is maintained as in many instances industrial units are the cheapest business accommodation available. Therefore, it is critical to ensure that there is adequate industrial development land supply available. The new industrial development land supply must be in a well located area near to major transport links and have the correct infrastructure available. • Crosswinds: The A listed building has already seen enabling development in its immediate vicinity. We would expect the listed building to be fully taken account of in any planning and layout of the new site. • The Crosswind site offers unique connectivity with its proximity to the Airport and the tram and rail links at the Gateway station offering easy links to other parts of Edinburgh and the wider Scottish network. • Seems sensible, provided the policy is flexible rather than rigid.	• Impacts of Covid-19 on requirements. • Newbridge - traffic implications of the Newbridge Roundabout must be considered and access to the motorway system needs to be improved • There is always empty warehousing on the various Newbridge Industrial Estates so why build more.	

16.2A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations; Leith Docks, Newbridge, Newcraighall, Edinburgh Airport Crosswinds.		
Agree Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223	**Disagree** Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Only support the 'Crosswinds' site if there are adequate improvements in roads capacity. • Leith Strategic Business Centre is sufficiently close to be included in an early phase of a district heating scheme centred on an ERF at EW 1d Seafield. As is shown by examples in Sheffield. Nottingham, and throughout northern Europe (eg Gothenburg), the other locations could also be connected if the network was expanded to the full available energy potential of an Energy Recovery Facility at Seafield. Leith Strategic Business Centre might also be supplied directly by a private wire electricity connection. In supporting business and industrial locations as set out in Choices we do not support mixed use development on EW 1d. It is suitable for business or industrial development as per existing Emp 8 and for an Energy Recovery Facility as per RS 3. • Provided transport links are good for visitors. • We need jobs and employment here, to foster data start up to create new jobs and value from this city. It has become weak from tourism,		

16.2A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations; Leith Docks, Newbridge, Newcraighall, Edinburgh Airport Crosswinds.		
Agree Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223	**Disagree** Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
which does not provide high quality (exportable) jobs skills or services. • As older sites are often used to create new housing care must be taken to protect inhabitants of the area from any substance or noise pollution relating to proposed new development. People living nearby any business/industrial site are reliant on the council to ensure this aspect of their health and well-being. • Should support active travel. • Need to use up existing sites first. • Makes sense for industrial sites to be out of town. • Hubs with mixed office and other use development sound good. • Leith, potential to create and enhance an existing vibrant community by allowing residential , commercial and office space to be created is an opportunity to demonstrate what a sustainable development for the future should be. • Leith Docks is within the vicinity of a Special Protection Area and potential impacts need properly assessed.		

16.2B - We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites.

Total responses – 439

Agree 77% (340)	Disagree 23% (99)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
- A much clearer definition of the criteria and requirements is needed . - This could be supported, providing that there is an allowance to repurpose the space in the event that it is clear and demonstrable that there is no demand for office accommodation as proposed. - Support the provision of office space as a key ingredient of mixed use neighbourhoods and welcome clear guidance based on best practice approaches. - Providing it is not imposed as a requirement on all urban sites. Many urban sites are not appropriate for business use, or a mix of uses and the appropriateness must be dependent upon the context to the site. - It is important to ensure that business space is linked to public transport network to enable sustainable commuting. - City Plan 2030 should recognise the growth of home-working (full-time and occasional). - Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces. - We need more space for new business both in the city and in new greenfield releases to create more sustainable communities.	- It is not always practical, viable, desirable or marketable to provide for business space in greenfield locations. A criteria-based policy may be helpful if proceeding. 1. We do not believe that providing a token amount of business space on a brownfield housing/mixed use site is viable and should not be adopted. 2. New business space on greenfield sites of scale should be promoted. - Market -led approach to business space in the greenfield locations should be taken and it should not be a requirement of place briefs. - Such an approach requires a critical understanding of the demand for business space in particular locations. This raises a further question over the Council's proposed approach to Place Briefs, which appears to exclude any consultation with developers and landowners. The proposed approach is very prescriptive, not only specifying particular use and scale but location within a site. - There will need to be a very clear justification for the displacement of viable businesses to make way for new housing development. It must be made clear why the development of business space on greenfield sites to accommodate businesses displaced from urban sites is a better	- It should be ensured that site identification is subject to robust environmental assessment of site proposals (both individually and cumulatively). If the preferred choice is brought forward to the Proposed Plan, we would expect to see greater detail. - There is merit in identifying suitable sites for office development, however, there needs to be a flexible approach. There should be a general presumption in favour of office development in urban locations which are well-served by good public transport links and which meet locational requirements for businesses. - Should recognise the growth of home-working (full-time and occasional) encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes. Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces.

16.2B - We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. Total responses – 439		
Agree 77% (340)	**Disagree 23% (99)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• However, we do not support a blunt approach to requiring new business space that will not be successfully occupied and traded from.	option than leaving existing businesses where they are and instead developing housing on the greenfield sites.	

16.2C - We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Total responses - 423		
Agree 87% (369)	**Disagree 13% (54)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• A continued mix of employment in the locality as offered by industrial estates is essential for bringing a diversity of roles and people into our community. Further, welcome the provision of industrial space that could cater for high-end businesses that could be an essential part of an entrepreneurial plan for our city. • Should the Council still seek to pursue this policy, we would request that they include criteria to allow greater flexibility to be applied, assessing redevelopment schemes on a case by case basis. • However the Emp 8 schedule of sites is restrictive and will not allow for sufficient re-provisioning of business space across the city. The range and choice of sites needs to be extended on a city-wide basis.	• This needs to be assessed strategically in conjunction with delivery of housing on brownfield sites and the realisation of connected mixed use neighbourhoods. For example, industrial estates are typically not particularly densely utilised and often form a barrier between adjacent areas. In some case, particularly urban locations, these sites could be better suited to denser mixed use. • Provided a development is delivering jobs and employment it should be acceptable on employment sites, not solely Use classes 4, 5 & 6. • This protection should not be continued for older industrial estates that are at the end of their building cycle life and could provide much needed brownfield development sites, as long as this is coupled with a much needed land supply	

16.2C - We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Total responses - 423		
Agree 87% (369)	**Disagree 13% (54)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
- But a lot of them are vacant, because they are too expensive for small or new ventures. - Need to protect light industrial and manufacturing provision in Leith. - There is a significant lack of supply of industrial property in the Edinburgh area and it will be important to safeguard even some older stock in order to support supply in the region. - Important to keep in mind industrial sites close to but outside the city boundary. These provide employment for many city residents and impact on city travel and housing. - Important to protect the existing industrial estates but think redevelopment proposals can be permitted when the loss of floorspace can be replaced elsewhere. - The plan should continue to safeguard land at Seafield (Site EW 1d) for a waste management facility incorporating thermal treatment with energy recovery.	- of new industrial development sites with proximity to transport links and infrastructure. - A flexible approach should be adopted - there is no point in protecting areas where no hope of the policy designation will ever be realized. - Industrial estates tend to be one-storey buildings, and become 'no-go' areas at night which are dark, unwelcoming, and create the risk of attracting anti-social behaviour. Buildings which contain a mix of uses and are active on a 24-hour basis are what is needed in a 21st century city.	

16.2D We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs.		
Total responses – 452		
Agree 92% (414)	**Disagree 8% (38)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
• Considerable work is needed to develop a policy to deliver a city-wide freight strategy of interconnected neighbourhood goods distribution hubs that integrate with the aims of the City Mobility Plan and the restriction proposed as part of the Low Emission Zone proposals. • While these distribution hubs could mitigate against the number of delivery vehicles entering the city, this could be offset by the volume of private car trips generated by people collecting from distribution centres. Distribution centres would have to be located where there is ease of access by public transport. Possibly park and ride sites could incorporate goods distribution hubs. • If this prioritises green transportation solutions, e.g. cargo bikes and electric vans. • The Covid-19 crisis has shone a light on the need for strong logistical networks including local facilities. • However, it is not reasonable to allow goods distribution hubs to be built, developed and utilised in areas where the impacts would be detrimental to residents or infrastructure of the city. • This is CRITICAL. The City, especially the Centre and most especially the Old Town is severely	• Plan should be flexible to be able to accommodate such proposed without "sterilizing" any particular pocket of land in the hope that that particular land use will be realized. • Further work need to be done to identify where these will be and consultation carried out ahead of the proposed plan. • More information is needed before a view could be properly formed.	

16.2D We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Total responses – 452		
Agree 92% (414)	**Disagree 8% (38)**	
Reasons for agreeing	**Reasons for disagreeing**	**Comments / other issues raised**
negatively impacted by ridiculously oversize and inappropriate delivery and other service vehicles. • We certainly see a great need for more locations around Leith for goods distribution hubs. Leith used to have lots of railway land and many large 'goods yards', but much of this land has now been lost to housing. The eastern edge of the docks, Seafield end, would be well suited for this. Therefore it should not be swallowed up by new building of houses, office /business units. • Waste disposal will also need to be co-ordinated to avoid the pressures of numerous vehicles from different private companies contracted by different businesses. • Such hubs are a good idea, but there's a danger of over-prescriptiveness and a less than optimal use of finite planning resources.		

Appendix 2 - Development Plan Scheme August 2020

Contents

Background
What is a Development Plan Scheme?
What is a Development Plan?
The bigger picture – 2050 City Vision and other strategies
A new plan – City Plan 2030
Participation Statement
Early Engagement (up to December 2019)
Choices for City Plan 2030 Consultation
The Proposed Plan
How to stay informed

What is a Development Plan Scheme?

A development plan scheme sets out how the next local development plan will be prepared. It includes:
- an explanation of what a Local Development Plan (LDP) is;
- a timetable for preparing the next plan, to be called City Plan 2030, and
- details on how you can get involved in preparing City Plan 2030.

The Council needs to publish a development plan scheme at least annually. The Council's last development plan scheme was published in January 2020.

What is a Development Plan?

The planning system impacts on everyone. Our lives are shaped by the places we live, work and visit and these places are shaped by planning decisions. The Scottish Government requires Councils to prepare development plans for their areas. LDPs contain a 10-year strategy for the future development of an area and set out policies and proposals to guide decision making on planning applications.

An LDP needs to take account of the following statutory documents:

The National Planning Framework: this sets out, at the national level, the Scottish Government's strategy for the country's spatial development, including developments of national importance. The third National Planning Framework was published in June 2014.

A replacement national planning framework is expected to be prepared during the preparation of City Plan 2030.

A Strategic Development Plan (SDP): this sets out a long term (20 years or more) spatial planning strategy for a city region, including where future development will be located and what is required to deliver it. The SDP for South East Scotland was approved in June 2013. It was prepared by the SDP Plan Authority for Edinburgh and South East Scotland (SESplan). The six councils which are members of SESplan are Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian.

The SDP, together with the LDP and any associated Supplementary Guidance (SG) form the SDP plan referred to in decisions on planning applications.

Edinburgh LDP (2016) - The current Edinburgh LDP was formally adopted on 24 November 2016. The plan is available online at www.edinburgh.gov.uk/localdevelopmentplan

The adopted plan is to be accompanied by twelve pieces of SG. These will also form part of the overall development plan. They cover the following matters:

- 9 town centres, including the City Centre Retail Core;
- Developer Contributions and Infrastructure Delivery;
- Edinburgh BioQuarter and Little France Park; and
- Heat Opportunities Mapping.

The plan is being used to determine planning applications. It is accompanied by a statutory Action Programme which is being used to ensure delivery of the plan's policies and proposals, including necessary infrastructure.

Councils are currently required to review their local development plan at least every five years.

Changes to the Planning System

A Planning Bill was passed by the Scottish Parliament in June 2019. It will not take effect for some time, because secondary legislation, guidance and transitional arrangements all need to be put in place by the Scottish Government. Accordingly, City Plan 2030 is being prepared under the existing legislation. Further information on changes to the planning system is available on the Scottish Government webpage.

The Bigger Picture

City Plan 2030 is being prepared at a time when the long-term future of Edinburgh is being considered.

- Edinburgh 2050 City Vision – an ongoing project in which residents, businesses and organisations define how they want the city to be in 2050;
- The Council Business Plan 2017/22 - this sets out the Council's commitments and priorities over a five-year period, several of which are relevant to the new LDP;
- Community Planning – Four Locality Improvement Plans have been prepared – one for each part of the Council's area. In addition, an overall Community Plan has been prepared to coordinate services across the public and voluntary sector;
- City Mobility Plan – a new transport strategy is being prepared alongside a project to deliver City Centre Transformation and a Low Emissions Zone;
- City Housing Strategy – a regularly updated strategy to deliver new affordable housing; and
- Edinburgh Economy Strategy – a strategy approved in 2018 which aims to enable good growth for Edinburgh's economy, based on inclusion, innovation and collaboration.

A New Plan – City Plan 2030

Our next LDPs can deliver the emerging vision of Edinburgh in 2050.

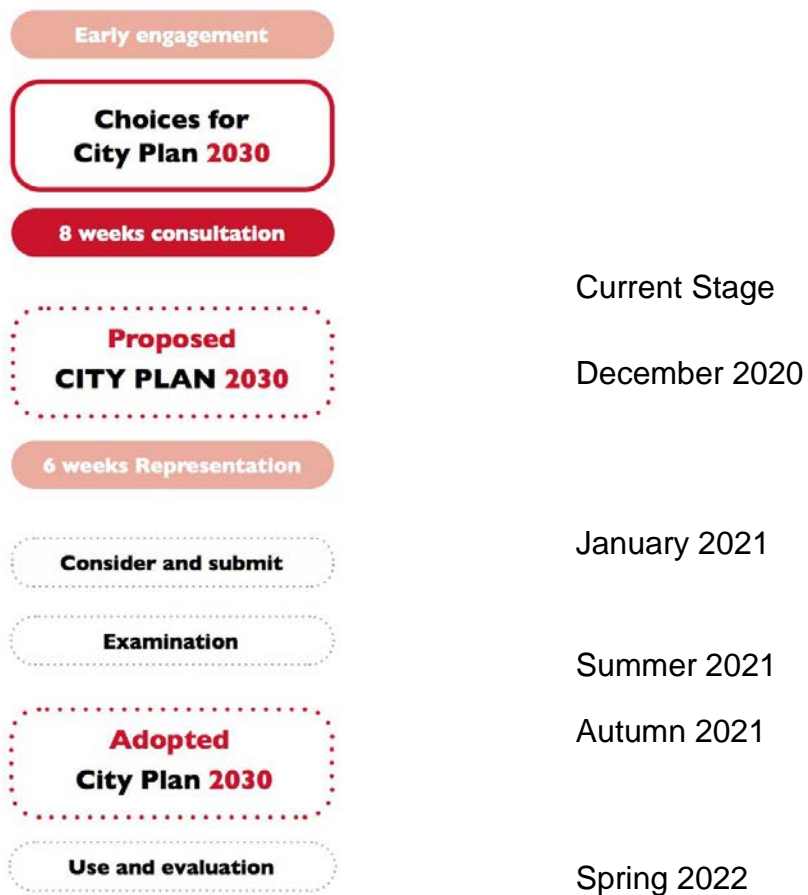The following diagram shows how a series of ten-year city plans can take us to 2050

City Plan 2030

The new LDP will be called City Plan 2030.

This name is intended to help explain what time period the plan covers, and to be more user friendly than calling our next plan an 'LDP'.

Timetable

Early engagement	
Choices for City Plan 2030	
8 weeks consultation	
Proposed CITY PLAN 2030	Current Stage December 2020
6 weeks Representation	
Consider and submit	January 2021
Examination	Summer 2021
Adopted City Plan 2030	Autumn 2021
Use and evaluation	Spring 2022

Choices for City Plan consultation		January to April 2020
Proposed Plan reported to Planning Committee		December 2020
Period for representations on Proposed Plan	6 weeks	January-February
Submit Plan and representations to Scottish Ministers	5 months after Proposed Plan formal publication	July 2021 (assumes no notifiable modifications.)
Examination and Report of Examination	6 to 9 months (target) + 1-month administrative preparation	December 2021 - March 2022
Plan as Modified	Within 3 months after Report of Examination	
Notify Scottish Ministers of intention to adopt	Within 3 months after Report of Examination	
Adoption	Within 3 months after Plan as Modified	March 2022

Project stage duration estimates are derived from Circular 6/2013 Development Planning.

PARTICIPATION STATEMENT

The following section sets out how we intend to engage during the preparation of City Plan 2030 and what we have been doing so far.

Early Engagement (up to Autumn 2019)
We have been working with community representatives and others to shape the choices to be presented in the main consultation stage in 2019/2020.

This engagement has included the following:

- Community briefings and workshops including 12 briefings with community Councillors and ward Councillors and six-community workshops;
- Children and Young People Engagement Programme, including nine Place Standard workshops in schools, sessions with geography classes in a high school (Boroughmuir), a session with a youth group (second one planned was cancelled due to Covid-19) and an exhibition stall at Climate Talks Youth Summit;
- Topic stakeholder discussion events, focusing on key land use issues including office and industry, development, housing, visitor accommodation and shopping and leisure;
- Use of social media to build awareness and interest in the project; and
- Engagement and consultation on closely-linked projects such as City Centre Transformation.

Choices for City Plan 2030 Consultation

The main issues report was the key consultation opportunity in the City Plan 2030 project. Our main issues report was called 'Choices for City Plan 2030'. It set out the main choices for the new plan, including the Council's preferred options for change and other reasonable alternatives.

We consulted on these choices using the Council's online Consultation Hub from 31 January 2020 and accepted responses up to 30 April 2020.

The following activities were used to raise awareness and encourage people to have their say:

- Launch of consultation document;
- Publicity to raise awareness of consultation and online engagement on Facebook, Twitter and LinkedIn;
- Notification to those groups and individuals on the project mailing list telling them how to comment;
- 11 key stakeholder sessions for key agencies, primary schools and transport groups, and three topic seminars (one seminar was cancelled due to Covid-19 pandemic);
- 8 Drop-in sessions to allow opportunity to find out more about consultation proposals (one event cancelled due to Covid-19 pandemic).
- Staffed exhibitions in public places to raise awareness; and
- 5 consultation hub surgeries to enable people to ask detailed questions and complete the survey online.

The consultation received 1,807 formal responses. This compares to 438 responses to the Main Issues report which led to the current LDP. Social media statistics demonstrate that knowledge of the project reached 1.2 million people, with over 24,000 engagements on our posts.

The Proposed Plan

The Proposed Plan is due to be reported to the Planning Committee in December 2020. It will be accompanied by a summary explaining how the main issues consultation responses have been taken into account.

Proposed Plan Representation Period

The Proposed Plan will then be published for a six-week period in which representations can be made. These can support the Proposed Plan or seek changes to it. These will then be considered first by the Council then by a Scottish Government reporter in an examination. The examination report can make recommendations for changes to the plan.

Impact of Coronavirus / Covid-19 on the proposed Plan Representation Period

The impact of the current health emergency on the period of representations to the proposed plan is not known at this stage. The Chief Planner wrote to all Local Authorities on the 3 April 2020, encouraging progress on delivering LDPs.

It is not known if social distancing and/or lockdown measures will be still in place in January 2021 to enable traditional, in person, engagement to go ahead. Therefore, an update to this participation statement will be provided at the time of publishing the proposed plan.

However, if possible, some, or all, of the following activities will be used to raise awareness and encourage people to have their say on the proposed plan:

- Launch of proposed plan;
- Publicity to raise awareness of proposed plan;
- Statutory neighbour notification;
- Notification to those groups and individuals on the project mailing list telling them how to comment;
- Staffed exhibitions in public places to raise awareness;
- Drop-in sessions to allow opportunity to find out more about consultation proposals;
- Best practice online/digital engagement (as guided by the Scottish Government's digital planning programme) which could include virtual exhibitions, a planning engagement hub, webinars and online events; and
- Non-digital engagement - including opportunities to ask informal questions, telephone surgeries, printed newsletters, hard copies of documents, paper letters and engagement via other council services.

How to stay up to date

Follow us: Twitter: @planningedin

Blog: planningedinburgh.com

View the project webpage at: www.edinburgh.gov.uk/cityplan2030

To find out more about engagement in the City Plan 2030 project or add yourself to the mailing list: cityplan2030@edinburgh.gov.uk