

# PLACE Response to City Plan 2030

We encourage all residents to register their views using the link below.

You can submit your own views, state you agree with the PLACE submission or use parts of it as you wish -

<https://consultationhub.edinburgh.gov.uk/sfc/choicesforcityplan2030/consultation/>

## Introduction

### 1. What is your name?

PLACE

### 2. What is your email address?

PLACEEdinburgh@gmail.com

### 3. If you do not have an email address What is your address?

Full address including postcode:

n/a

### 4 I am responding as

PLACE is a grassroots network of residents personally affected by the rapid expansion of largely unlawful whole property short-term lets in our buildings and communities. The network was set up in April 2019 to share information on how to report short-term lets that are operating without planning permission or in breach of title conditions; and to lobby the City of Edinburgh Council and the Scottish Government to take action to protect residents' rights to peaceful, liveable and affordable communities in Edinburgh.

### 5 If you are an agent/consultant and responding on behalf of an organisation or an other individual, what is their name?

n/a

**6 I agree to having my name published as part of my representation.**

Yes

# The Choices for City Plan 2030

\*These Choices relate to the PLACE priorities.

1. Choice 1 - Making Edinburgh a sustainable, active and connected city
2. Choice 2 - Improving the quality, density and accessibility of development\*
3. Choice 3 - Delivering carbon neutral buildings
4. Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans
5. Choice 5 - Delivering Community Infrastructure
6. Choice 6 - Creating places that focus on people, not cars
7. Choice 7 - Supporting the reduction in car use in Edinburgh
8. Choice 8 - Delivering new walking and cycling routes
9. Choice 9 - Protecting against the loss of Edinburgh's homes to other uses\*
10. Choice 10 - Ensuring the better use of land
11. Choice 11 - Delivering more affordable homes\*
12. Choice 12 - Building our new homes and infrastructure
13. Choice 13 - Supporting inclusive growth, innovation, universities, & culture\*
14. Choice 14 - Delivering West Edinburgh
15. Choice 15 - Protecting our City Centre, Town and Local Centres
16. Choice 16 - Delivering Office, Business and Industry Floorspace
17. Equalities and Rights\*
18. Technical Changes

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

**1A We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this?**

Explain why:

1B We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? (PLACE explanation for our network - Blue infrastructure refers to water elements, like rivers, canals, ponds, wetlands, floodplains, water treatment facilities, etc. Green infrastructure refers to trees, lawns, hedgerows, parks, fields, forests, etc. These terms come from urban planning and land-use planning). Yes

Explain why:

As part of a health and wellbeing economy prioritising green and blue infrastructure it is important to ensure that communities have access to nature. This is backed by research and the new Public Health Scotland's six Public Health Priorities. In addition, with climate change and rising sea levels, green and blue infrastructure that act as reservoirs, are essential to control and direct excess water, reducing flooding in residential areas.

1C We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this?

Explain why:

1D We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this?

Yes, with qualifications.

Explain why:

Yes, but defining what “underused spaces” are is important.

The usage of Princes Street Gardens (East and West) has highlighted the importance of green spaces and common good land to the people of Edinburgh.

1E We want to introduce a new ‘extra-large green space standard’ which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this?

Explain why:

1F We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this?

Explain why:

1G We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?

Explain why:

1H We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this?

Explain why:

## Choice 2 - Improving the quality and density of development\*

**2A We want all development (including change of use), 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.**

**Do you agree with this? Yes - modified to include a target of 10% accessible housing.**

### **Explain why:**

Everyone has a right to adequate housing. The right to adequate housing will be enshrined in the the proposed Act of the The First Minister's Advisory Group on Human Rights Leadership<sup>1</sup>. We ask the City of Edinburgh Council to make their own declaration to support the right to adequate housing and become a signatory to #MakeTheShift, the global campaign by the Special Rapporteur on Adequate Housing, along with forty other leading cities around the world.

The PLACE network includes residents who are struggling to find adequate and adaptable housing in Edinburgh. Some feel they are forced to accept inadequate housing which does not meet their needs, in the absence of any other housing option at a price they can afford. Those needing accessible housing find sourcing adequate housing especially challenging.

The experiences of the PLACE network reflect the findings of the Equality and Human Rights Commission who describe the shortage of accessible housing as "Scotland's Hidden Crisis".<sup>2</sup> It is also worth noting the additional social isolation that many disabled people experience as they are not included in social events in their friends and families' homes as most residential properties in Edinburgh are not accessible.

We encourage the City of Edinburgh Council to read and act on the recommendations of the Equality and Human Rights Commission to ensure

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1

<https://humanrightsleadership.scot/wp-content/uploads/2018/12/First-Ministers-Advisory-Group-on-Human-Rights-Leadership-Final-report-for-publication.pdf>

2

<https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-people-scotlands-hidden-crisis>

that a minimum of 10% of new housing is built to wheelchair-accessible standards.

The Commission's report calls for the building of more accessible and adaptable homes and highlights Glasgow City Council who have required all new developments of 20 dwellings or more to provide 10% of housing to a wheelchair-accessible or a readily adaptable standard since 2009. By having more adaptable homes it enables residents who have built up local connections and support networks to remain in their homes longer if they develop health conditions or impairments that would otherwise mean a house move in traditionally designed housing.

There is a particular concern that the current Guidance for Businesses section on short stay visitor accommodation, has the effect of incentivising accessible main door accessible properties for short-term letting investment, when these need to be protected for accessible housing. The shortage of accessible housing is likely to be especially acute in Edinburgh where nearly two thirds of the housing stock is in tenements<sup>3</sup> and do not make for easily accessible homes. Ground floor properties must be protected for accessible homes.

Those in our network with experience working in and managing Housing Associations, suggest that in addition to being wheelchair-accessible, all new-build ground floor should be readily adaptable for installation of tracking hoists and wet floor bathrooms. These recommendations are similar to the "Glasgow Standard"<sup>4</sup>. The design schedule for housing outlines the standards required for properties funded through the Affordable Housing Supply Programme in Glasgow and brings together all of the good practice to set out an exemplar minimum standard for all new build housing in the city.

Our buildings need to be sustainable to meet our aspiration to become net-zero for all greenhouse gases by 2045 under the Climate Change Act 2019. We support this policy.

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. Do you agree with this?

Explain why:

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<sup>3</sup> <https://www.edinburgh.gov.uk/downloads/file/24256/housing---topic-report-for-edinburgh>

<sup>4</sup> <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=45371&p=0>

2C We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this?  
Yes.

Explain why:

We support policies which make our cities more liveable, affordable and which reduce social isolation.

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, without losing densities. Do you agree with this?

Explain why:

## **Choice 3 - Delivering carbon neutral buildings**

3A We want all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. Instead we could require new development to meet the bronze, silver or gold standard. Which standard should new development in Edinburgh meet?

Explain why:

# 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, and transport, education and healthcare infrastructure development should deliver. Do you agree with this?

Yes

Explain why:

Place Briefs can be an effective way to identify the priorities of communities, as long as communities are involved in co-developing them as equal partners from the start, rather being 'engaged' or 'consulted' with once the parameters have been decided without them.

This is a longer process than a few months followed by an online consultation, but it will create plans that will meet local needs and reach people often excluded or marginalised by the current consultation processes.

The community may raise issues but they are also likely to suggest solutions.

A good example of a Place Plan was that created by Leith Creative from 2017-2019. 18 events were run and almost 3000 people reached, with contributions from the majority of people living in the area (88%).<sup>5</sup>

This process is much more comprehensive and accessible than blunt consultation. The process removes the need for residents to be experts in planning and council policies, rather it focuses instead on their lived experience. This method echoes the community development, town planning principles of Patrick Geddes.

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

**How should the Council work with local communities to prepare Local Place Plans?:**

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<sup>5</sup> <http://www.leithcreative.org/findings/>

The Council should actively seek to work with their communities to co-produce local Place Plans. Budgets will need to be allocated for qualified and experienced Community Learning and Development / Community Education professional staff to lead on a whole systems approach to any local place plan. Draft documents and presentations need to be available in a range of accessible formats at the start of a process.

Working with existing community organisations such as PLACE will be an effective way to reach large audiences, and connect with issues that are already affecting our communities.

## 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 and deliverable within the plan period. Do you agree with this?

Yes.

Explain why:

This seems appropriate as long as there is sufficient capacity for the development, and developments are fully accessible, and agreed with communities.

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. Do you agree with this?

Yes, when there is a clear and easy provision for accessible travel.

Explain why:

It would be useful to define community facilities. The previous plan defined these as “facilities such as local doctor and dental surgeries, local shops, community halls and meeting rooms are necessary to foster community life”. This seems entirely appropriate.

A balance is needed between active travel and accessibility.

An example of this conflict is the Waverley bridge plaza which could be defined as a community facility but we may find later is additionally used for events. Feedback from the City Transformation Plan expressed a strong desire for access to Waverley Station by taxi or private vehicle, in particular for older people and disabled people. It was felt that the proposed Waverley Bridge plaza would create a positive impression for those arriving in the city, in particular tourists, and that the space should not be used for events. Concerns were also raised about traffic and tour bus displacement as a consequence of this proposal.<sup>6</sup>

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<sup>6</sup>

<https://democracy.edinburgh.gov.uk/documents/s6001/Item%207.1%20-%20ECCT%20Final%20Strategy%20with%20all%20appendices.pdf>

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. Do you agree with this?

Yes.

Explain why:

Most people want to have local affordable community facilities, open at useful times, within their own communities.

5D.1 We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this?

Yes, in principle.

Explain why:

As described above.

5D.2 We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this?

Explain why:

Plain English only please. What are 'Cumulative contribution zones'?

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. Do you agree with this?

Explain why:

Again, not clear what this means.

## Choice 6 - Creating places for 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. Do you agree with this?

Yes, when there is a clear and easy provision for accessible travel.

Explain why:

We support Active Travel which promotes healthy communities.

The PLACE network includes residents with limited mobility who have expressed concerns about how well intentioned Active Travel policy might limit accessible travel for them.

They note that the Active Travel hierarchy of travel options which identifies walking and cycling as the most preferred options, may disadvantage disabled people, their unpaid carers, and paid support staff.

Our network expresses concern that public transport is not accessible enough presently, let alone for a growing older population. In addition, social care support provided at home to allow the Scottish Government/CoSLA agreed Independent Living, as a Human Right, is not set up for contracts that fit with Active Travel.

It appears that Lothian Buses have already stated that the Transformation Plan idea to have Mobility Interchange Hubs in the city centre is not workable.

Not everyone can read the complex draft consultations in jargon, read unsuitable formats, use the internet, or can attend a single drop-in session to gain the skills to give informed decisions. The Accessible Travel Framework says we must “Ensure disabled people are more involved in how we plan and carry out transport services.”<sup>7</sup>

**We support effective active transport policy which will provide equal access for all to access active and accessible transport in a way that best supports their health and wellbeing.**

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<sup>7</sup> <http://accessibletravel.scot/accessible-travel/>

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. Do you agree with this?

Yes, when there is a clear and easy provision for accessible travel.

Explain why:

As described above.

# Choice 7 - Supporting the reduction in car use in Edinburgh

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. Do you agree with this?

Explain why:

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. Do you agree with this?

Explain why:

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. Do you agree with this?

Explain why:

7D We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this?

Explain why:

## Choice 8 - Delivering new walking and cycle routes

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this?

Explain why:

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 to ensure that they are delivered. Do you agree with this?

8C We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan

2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this?

Explain why:

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

**9A We want to consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach?**

Yes!

## Explain why:

The proliferation of (largely unlawful) short-term lets in Edinburgh has seriously affected the housing affordability, peace, privacy, safety, security and dignity for the Edinburgh population.

Edinburgh has one of the highest concentrations of short-term lets in the world, with over one in four dwellings in the Old Town being listed on Airbnb<sup>8</sup>. The actual figure of short-term lets is significantly higher. A review of short-term let planning appeals by PLACE finds that a third of the DPEA cases relating to unlawful short-term lets were not advertised on Airbnb, but other platforms and agencies. This suggests actual figures are 50% higher than those based on Airbnb statistics only.

Concentrations of unlawful short-term lets are found all over the city. The independent research by Indigo House for the Scottish Government finds 12.78% of all City Centre dwellings are active listings on Airbnb, and noted further concentration in Leith Walk, Leith, Southside/Newington, Fountainbridge.

Unlawful short-term lets have been closed by Enforcement Notices in almost every part of the city<sup>9</sup>.

Designating only part of Edinburgh as a control area ignores the negative impact short-term lets have on neighbours. Two-thirds of Edinburgh housing is entirely inappropriate for short-term letting because it is in tenements. It has been concluded at thirty-three (and rising) DPEA planning appeals, that short-term lets have a materially detrimental impact on the living conditions for close neighbours. Significant impacts are described including: increased antisocial behaviour, noise, disruption,

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<sup>8</sup>

<https://www.theguardian.com/technology/2020/feb/20/revealed-the-areas-in-the-uk-with-one-airbnb-for-every-four-homes#>

<sup>9</sup> <https://docs.google.com/document/u/1/d/1MV0-bfYx8B3bkCjF0i16ksV9QytfUmP4RGEevRAXEP8/edit>

intrusion by a frequent turnover of strangers, loss of community, and loss of security.<sup>10</sup> Main door properties have also been found unacceptable for short-term letting when they are close to other residential properties and / or they engage large groups<sup>7</sup>.

Good housing and communities are fundamental to our health and wellbeing. This is the conclusion of The Commission on Housing and Wellbeing, established by Shelter Scotland. The report states: “It is about the central importance of having a safe, secure and suitable home that allows people to fulfil their potential, and a home that is embedded in and linked to a strong, vibrant local community where people can live good lives”.<sup>11</sup> The City Plan does not mention this important link between housing and wellbeing but the negative health and wellbeing impacts of inadequate or insecure housing are expressed regularly by our network. The vital role of neighbours in supporting members of our community that feel vulnerable or are at greater risk, due to underlying health conditions or being disabled, has been well publicised during the coronavirus pandemic. Some residents no longer have this support network due to the rapid increase of unlawful short-term lets around them.

Our communities are being critically hollowed out, residents have lost their neighbours, and the safety and security of our homes is significantly reduced by the high turnover of strangers using unlawful short-term lets; and by the key safes littering our doorways. DPEA cases regularly reference the physical loss of security for neighbours sharing communal spaces with unlawful short-term rentals<sup>12,13,14</sup>. Unlawful short-term lets have also voided shared buildings insurance<sup>15</sup> and are prohibited by many title deeds. This is unacceptable.

**The whole of Edinburgh must be designated a “Short-Term Let Control Area” without exception.**

Only designating part of Edinburgh as a “Short-Term Let Control Area” would also have the unintended and unacceptable consequence of heavily incentivising the remaining main door properties for short-term investment. Main door properties are in critically low supply, provide vital accessible housing, and provide an important mix of family-friendly homes.

**The whole of Edinburgh must be designated a “Short-Term Let Control Area” without exception.**

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<sup>10</sup> <https://docs.google.com/document/u/1/d/1MV0-bfYx8B3bkCjF0i16ksV9QytfUmp4RGFEvRAXEP8/edit>

<sup>11</sup> <http://housingandwellbeing.org/assets/documents/Commission-Final-Report.pdf>

<sup>12</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=120636>

<sup>13</sup> <http://dpea.scotland.gov.uk/CaseDetails.aspx?ID=120265>

<sup>14</sup> <https://docs.google.com/document/d/1MV0-bfYx8B3bkCjF0i16ksV9QytfUmp4RGFEvRAXEP8/edit>

<sup>15</sup> <https://drive.google.com/file/d/1UwfCDYLMDP5y9QjYYgpAAQJ9xmZ6wTpV7/view?usp=drivesdk>

There may be a small amount of short-term letting (genuine home sharing) that would be permitted without a change of use. PLACE recommends that existing case evidence relating to short-term lets and guest houses is used to set this home sharing allowance at a lawful level which is consistent with case precedent, protects neighbouring amenity, protects the security of residential buildings and prevents exploitation by unethical hosts.

**We suggest that the home sharing allowance provides a licensed allowance of four entire-home short-term lets per year, where no more than one let is allowed per month. This allows residents to supplement their income very generously while still protecting residential amenity.**

Four short-term lets would enable, for example, a two week let over major festival times, a week let over the summer, a five day let over Easter and a further weekend let. The income is the same, but the disruption is far less.

Residential amenity is protected by law. The existing case law informs how the home sharing allowance can be set without impacting neighbouring amenity. There are several cases which are helpful here: Ratcliffe Terrace<sup>16</sup> in Edinburgh found 30 days of lets over 14 lets unlawful; Nemcova v Fairfield<sup>17</sup> in London found seven lets over one year unlawful; Baxter's Place<sup>18</sup> found weekly lets unlawful. Case evidence says both the number of days and turnover of lets needs to be regulated. A home sharing allowance of four licensed lets per year is a lawful compromise.

One three week let is much less disruptive than 10 two-day lets with same day changeovers. Licensed allowances protect amenity even when multiple flats are using their allowance at the same time as is likely during the busier summer and local festivals period, or where there are multiple student flats available over the summer.

Some cities have attempted to use a limit based on a number of days but the experience has been challenging. London limits have been described as "ineffective"<sup>19</sup>. The deputy mayor for housing in Paris states "Airbnb does not respect the law"<sup>20</sup>. Amsterdam has reduced their sharing allowance to 30 days after 60 days was found to be ineffective. Airbnb refused to implement this law<sup>21</sup>. Recently ten European cities wrote to the European Union for help to fight Airbnb expansion<sup>22</sup>.

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<sup>16</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=118600>

<sup>17</sup> <https://nearlylegal.co.uk/2016/09/short-term-lets-private-residences/>

<sup>18</sup> <https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=120406>

<sup>19</sup> <https://www.bbc.co.uk/news/uk-england-london-38924720>

<sup>20</sup> <https://twitter.com/IanBrossat/status/1154650938336063489>

<sup>21</sup> <https://nltimes.nl/2019/07/31/airbnb-suspended-amsterdams-economic-board>

<sup>22</sup> [https://twitter.com/Edinburgh\\_CC/status/1144285713581654018](https://twitter.com/Edinburgh_CC/status/1144285713581654018)

Restricting home sharing by limiting the number of short-term lets makes evidencing unlawful letting much easier even without compliance by platforms or their hosts. Any property with more than four reviews per year can be seen clearly to be acting unlawfully, and can be sanctioned.

We point to the large number of cities who find short-term letting incompatible with residential living, particularly in flats. Short-term letting in apartments is prohibited in New York (in buildings with more than three units), Barcelona, Palma, Mallorca, Istanbul, Singapore and Hong Kong to name a few.

We believe that Edinburgh can be a world leader in using resident led, rights based legislation to ensure peaceful, private and safe communities, while promoting sustainable and positive tourism. A lets-based framework for home-sharing is easily enforceable, motivates genuine home sharing and makes unlawful activity easier to spot and act on.

**9B We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this?**

Yes! Yes! Yes! - in addition to this, can empty homes be included as an “other use” to encourage these to be brought back into use.

#### **Explain why:**

We strenuously support this policy because it clearly and unambiguously protects housing, for people to live in.

Such a policy is vital to protect the right to adequate housing against future threats which cannot be currently anticipated (as has already happened with short-term lets).

A similar policy previously existed in the 2010 Local Development Plan<sup>23</sup>. It stated:

*“6.22 The retention of existing housing is important as a means of meeting housing need, including the need for low cost housing. The demand is such that planning permission is seldom sought for a change of use away from housing. In exceptional circumstances indicated in the policy, a change of use will be accepted.*

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<sup>23</sup> <http://edinburghcouncilmaps.info/dev/plans/eclp/chap6.htm>

*The demolition or change of use of an existing dwelling will only be permitted if it can be demonstrated that either: the property provides a poor living environment which could not readily be improved, or the proposal is for a use that will benefit the local community without loss of amenity for neighbouring residents.”*

Had this policy still been in existence it could have been used to much more effectively deal with the proliferation of short-term lets rather than making complex and expensive judgements on the impact on amenity.

We strenuously support this policy.

# Choice 10 - Ensuring the better use of land

10A. We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this?

Yes.

Explain why:

At the moment purpose-built student housing is being built at an unprecedented speed and scale. These have the potential to overwhelm local communities and infrastructure. They are not always built within a 15/20 minute walk of any educational institution which increases the need for additional travel between student residences and educational institutions.

10B We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this?

Yes.

Explain why:

We support policy which promotes the building of more adequate housing.

10C We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this?

Explain why:

# Choice 11 - Delivering more affordable homes\*

**11A We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach?**

Yes.

## **Explain why:**

Edinburgh has a housing crisis. The lack of adequate affordable housing is experienced and discussed almost every day on the PLACE and other grassroots networks.

The latest Housing Need and Demand Assessment (HNDA2), 2015, states there is demand for between 38,000 and 46,000 new homes in Edinburgh over ten years; over 60% of these homes need to be affordable. There is particular demand for social rented housing in Edinburgh. Social rented homes account for only 14% of the housing stock in Edinburgh, compared to the Scottish average of 23%. There is a high demand for social rented housing, with an average of almost 190 households bidding for every social rented home that becomes available for rent. Lastly, it is estimated that there has been a loss of around 10% of Private Rented Sector homes to short term lets in recent years. The Strategic Housing Investment Plan states the rapid growth in short term lets is creating further pressure on supply, rent levels and house prices in some areas as properties are purchased for short term let rather than long term rent or owner occupation.

<sup>24</sup>

**Ambitious targets which set high expectations for building quality affordable and social housing, while protecting the existing stock from short-term letting and other exploitation, must be the priority of the City Plan 2030.**

The benchmark of 35% affordable housing is a clear improvement on the existing 25%. Challenging the 25% benchmark is one of the recommendations by Shelter to deliver affordable housing through the planning system<sup>25</sup>. The City Plan should resist developers from negotiating down from the 35% benchmark.

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<sup>24</sup> <https://democracy.edinburgh.gov.uk/mgConvert2PDF.aspx?ID=10135>

<sup>25</sup> [https://scotland.shelter.org.uk/\\_data/assets/pdf\\_file/0011/794639/Planning\\_to\\_meet\\_the\\_need.pdf\\_nocache](https://scotland.shelter.org.uk/_data/assets/pdf_file/0011/794639/Planning_to_meet_the_need.pdf_nocache)

Our network raises the concern that there is no formal definition for affordable housing and that such a definition could be useful. They point out that high house prices in Edinburgh mean that even low-cost homeownership is out of reach for most low paid workers and those in insecure jobs. Their experience is that much affordable housing which is being built is 80% market rate which is still unaffordable for many.

Our network welcomes more social housing. Our network asks that affordable housing units which will be owned or managed by a registered social landlord through affordable housing contracts should be let at social rent levels, not market rents.

**The City Plan should specifically promote building of more social housing in Edinburgh as this is the area where there is the greatest demand.**

The Strategic Housing Investment Plan states the rapid growth in short-term lets is creating further pressure on supply, rent levels and house prices in some areas as properties are purchased for short term let rather than long term rent or owner occupation.<sup>26</sup>

The rush of rental properties returning to the market after restrictions on travel under Covid-19, is evidence of the high number of properties that have been removed from the market.

**The whole of Edinburgh must be designated a “Short-Term Let Control Area” without exception.**

**There must be specific policy which resists the loss of homes to any alternative uses.**

**11B We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this?**

Yes - with a minimum 10% accessible homes.

Explain why:

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<sup>26</sup> <https://democracy.edinburgh.gov.uk/mgConvert2PDF.aspx?ID=10135>

The Edinburgh population has a wide range of different and changing needs. We have an aging population and there is a crisis in accessible homes<sup>27</sup>.

As described in Choice 2 and 9, we support policy which protects and creates adequate housing for everyone to have their rights to Independent Living, with the freedom to have choice, dignity, and control.

We support policies which protect and create a wide range of accessible, family-friendly (where multiple rooms and gardens are desirable), adaptable and affordable homes.

We support tenure blind developments which integrate affordable and market housing.

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<sup>27</sup>

<https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-people-scotlands-hiddden-crisis>

# Choice 12 - Building our new homes and infrastructure

12A Which option do you support?

Explain why you support that option, or why haven't chosen an option:

12B Do you support or object to any of the proposed greenfield areas?  
(Please tick all that apply)

Explain why:

12C Do you have a greenfield site you wish us to consider in the proposed Plan?

12D Do you have a brownfield site you wish us to consider in the proposed Plan?

# Choice 13 - Supporting inclusive growth, innovation, universities, & 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.

Do you agree with this?

No.

We question whether a policy which supports increasing tourism in a city already suffering from overtourism is helpful in creating a balanced economy or sustainable given the increasing negative impacts of over tourism.

A policy which supports social enterprises, start-ups, culture, innovation, learning and the low carbon sector is welcome.

Explain why:

Defining a city as suffering from overtourism is difficult, but the European Parliament Research for TRAN Committee - Overtourism: impact and possible policy responses suggest five indicators<sup>28</sup>. All five indicators are met by Edinburgh:

- tourism density (bed-nights per km<sup>2</sup>) and intensity (bed-nights per resident)
- the share of Airbnb bed capacity of the combined Airbnb and booking.com bed capacity
- the share of tourism in regional Gross Domestic Product (GDP);
- air travel intensity (arrivals by air divided by number of residents);
- closeness to airport, cruise ports and UNESCO World Heritage Sites.

The research also suggests the frequency of discussion on overtourism on social media is an indicator, which cannot be denied in Edinburgh.

The consequences of overtourism include increasing congestion, pressure on local infrastructure, pollution, visitor behaviour, environmental degradation, damage to historical sites, loss of identity, increasing living costs for local residents and increasing inequality among local residents.

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<sup>28</sup> [https://www.europarl.europa.eu/RegData/etudes/STUD/2018/629184/IPOL\\_STU\(2018\)629184\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2018/629184/IPOL_STU(2018)629184_EN.pdf)

These concerns are expressed daily in local newspapers and experiences are described regularly on the PLACE and other social networks.

# Choice 15 - Protecting our city centre, town and local centres

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. Do you agree with this?

We support the "15 minute city" model of self-sufficient communities within Edinburgh.

We do not support further congestion in, or "touristification" of the city centre.

Explain why:

Edinburgh City Centre is already highly congested in terms of traffic, tourism and events. Many feel this has been impacting the quality of life for city centre residents for some time now and is only getting worse.

We support the "15 minute city" currently being promoted by world cities. This would aim to develop self-sufficient communities within Edinburgh where shops, parks, cafes, sports facilities, health centres, schools and workplaces are no longer than a 15 minute easy journey away. Edinburgh already has many distinct and unique communities which should be developed to incorporate these needs if they do not already do so.

Such a model would reduce pressure on the City Centre, reduce the pollution and stress associated with long commutes. It would also increase community cohesion as there would be more community interaction at a local level.

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. Do you agree?

Explain why:

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. Do you agree?

Explain why:

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. Which approach do you support?

Explain why:

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

No

Explain why:

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 either completed or come up for planning permission.<sup>29</sup>

In a city with limited development space, this space should be used for homes, not hotel rooms that will lie empty.

15F 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. Do you agree with this approach?

Explain why:

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<sup>29</sup>

<https://www.edinburghnews.scotsman.com/arts-and-culture/edinburgh-festivals/edinburgh-builds-too-many-hotel-rooms-tourists-after-numbers-soar-50-1995436>

# Choice 16 (part 1) - Delivering office floorspace

16A.1 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. Do you agree?

Explain why:

16A.2 We want to support office development at commercial centres as these also provide accessible locations.

Explain why:

16A.3 We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree?

Explain why:

16A.4 We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree?

Explain why:

16A.5 We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree?

Explain why:

Do you have an office site you wish us to consider in the proposed Plan?

16B We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this?

Explain why:

16C We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office

buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could introduce a 'loss of office' policy only in the city centre.

Explain why:

## Choice 16 (part 2) - Delivering Business and Industrial Space

16E We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree?

Explain why:

16F 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. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree?

Explain why:

16G We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree?

Explain why:

16H We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree?

Explain why:

# Equalities and Rights\*

17 Do you think there will be any equalities or rights impacts (positive or negative) arising from the Choices?

Yes.

Explain why:

The following rights are impacted by policy:

- right to adequate housing,
- right to respect for private and family life, home and correspondence
- right to protection of property (peaceful enjoyment),
- right to protection against poverty and social exclusion,
- right to social security and social protection,
- right to a healthy environment
- rights belonging to children, women, persons with disabilities, on race and rights for older persons and for LGBTI communities

Resources

- Planning case appeal evidence on short-term lets, PLACE, 2020.
- City Plan 2030 Housing Study, City of Edinburgh Council, 2020.
- Planning to meet the need, Shelter, 2014.
- Edinburgh Poverty Commission: Places, Shelter December 2019.
- Response to the Scottish Government, City of Edinburgh Council, 2019.
- Housing and disabled people: Scotland's hidden crisis, Equalities and Human Rights Commission, 2018.
- Housing "Hidden Crisis" report welcomed, Inclusion Scotland May 2018.
- Our Place, Our Space, The evidence on disabled people's housing issues from Scotland's Disabled People's Summit, Inclusion Scotland 2016.
- Fairer Scotland Action Plan, Fifty actions to help tackle poverty, reduce inequality and build a fairer and more inclusive Scotland, 2016.
- Scotland's public health priorities, Scottish Government and CoSLA 2019.